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ATTACHMENTS

ATTACHMENT 1: Amended Florida Reliability Coordinating Council Regional Reliability Standard Development Process Manual – Clean

ATTACHMENT 2: Amended Florida Reliability Coordinating Council Regional Reliability Standard Development Process Manual - Redline

ATTACHMENT 3: Florida Reliability Coordinating Council Regional Reliability Standard Development Process Manual Revisions Summary Document

Attachments 1 and 2 to this Petition are clean and redlined versions, respectively, of the proposed revised FRCC SDPM. As the redline changes are extensive, **Attachment 3** contains a section-by-section comparison of some of the more significant standard development process changes from the current FRCC SDPM to the revised FRCC SDPM to assist the Commission in reviewing the proposed revisions.

I. NOTICES AND COMMUNICATIONS

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II. PROPOSED FRCC SDPM

The currently effective version of the FRCC SDPM is Version 0 developed in 2007 and approved by FERC on March 21, 2008.⁵ In the intervening years, numerous improvements have been made to the NERC Standard Processes Manual and other Regional Entity standard development processes. The proposed amendments to the FRCC SDPM are intended to align the FRCC SDPM with the improvements made to those other processes and to clarify roles, responsibilities, and processes for standards development. As a preliminary matter, the FRCC SDPM has been revised to reflect that the FRCC Regional Entity Committee and Compliance Forum (“RECCF”) exercises oversight authority responsibilities with regards to the FRCC

⁵ *N. Am. Elec. Reliability Corp.*, 122 FERC ¶ 61,245 (2008).

SDPM, consistent with FRCC Bylaws revisions approved by the Commission in 2015.⁶ The other proposed amendments revise the FRCC SDPM to accomplish a number of objectives, including:

- Incorporation of the results-based standards principles and NERC standard template.
- Inclusion of concurrent posting periods, to significantly reduce the length of time required for standards development.
- Addition of clarifying details surrounding the development and approval of Violation Severity Levels and Violation Risk Factors and the responsibilities and roles of participants in the FRCC process.
- Addition of a new FRCC Regional Reliability Standard development process flowchart.
- Updates to the Standard Authorization Request document to incorporate functional entity changes and addition of clarifying language.
- Updates to the format of the document.

The discussions in the following subsections describe the proposed amendments to the FRCC SDPM.

A. Table of Contents

The original Table of Contents for the FRCC SDPM is removed and replaced with a new Table of Contents that reflects the renumbering and reformatting of the FRCC SDPM.

B. Section 1.0 - Purpose

Section I – Introduction and Background in the current FRCC SDPM has been reorganized. The material formally contained under the subheading of *Purpose* in Section I of the current FRCC SDPM has been renumbered in the proposed FRCC SDPM as Section 1.0 – Purpose. Minor changes have been made to the text of this section to capitalize the terms Electric Reliability Organization and Reliability Standard.

⁶ *N. Am. Elec. Reliability Corp.*, Docket No. RR15-3-000 (Jan. 13, 2015) (delegated letter order).

The FRCC Regional Reliability Standard Principles currently contained in Section I – Introduction and Background have been moved, with modifications as discussed below, into Section 3.1 of the revised FRCC SDPM.

C. Section 2.0 - Background

The revised FRCC SDPM adds a new background material section that contains information regarding FRCC’s responsibilities and delegated authority. This section also clarifies that FRCC regional standards only apply to the FRCC footprint.

D. Section 3.0 - FRCC Regional Reliability Standards Development Process

The revised FRCC SDPM reorganizes and renumbers information regarding the process steps, roles, standard elements, and guiding principles for the development of FRCC Regional Reliability Standards under the FRCC SDPM to Section 3.0 – FRCC Regional Reliability Standards Development Process. A summary of the process and other changes is provided below. A comparison of the current to proposed process steps is provided in Attachment 3 to this Petition.

1. Section 3.1- FRCC Regional Reliability Standards Principles

As noted above, the FRCC Regional Reliability Standards Principles have been moved from Section I – Introduction and Background in the current FRCC SDPM to Section 3.1 of the revised FRCC SDPM. The following principles have been added to the revised FRCC SDPM, consistent with the essential attributes of NERC’s Reliability Standards Processes:⁷ (i) voting, which provides that the FRCC process shall have a balance of interests and diverse participation shall be encouraged; (ii) notification of standards development; (iii) transparency; (iv) consideration of views and objections; (v) consensus building; (vi) consensus vote; and (vii)

⁷ See Standard Processes Manual, Appendix 3A to the NERC Rules of Procedure at Section 1.4, available at <http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>

timeliness. In addition, the principle of open participation has been revised to provide additional language to clarify that there are no barriers that would prevent any party or entity from participating in the FRCC regional standard development process.

2. Section 3.2 - FRCC Regional Reliability Standard Elements

The provisions contained in Section II of the current FRCC SDPM – FRCC Regional Reliability Standard Definition, Characteristics, and Elements have been moved to Section 3.2 of the revised FRCC SDPM. In Section 3.2.1, the currently-effective definition of Reliability Standard has been added. Sections 3.2.2 – Reliability Principles and 3.2.3 – Market Principles expand upon the obligation to develop Regional Reliability Standards that are consistent with NERC’s Reliability Principles as well as NERC’s Market Interface Principles. Section 3.2.5 – Types of Reliability Requirements defines the type of reliability requirements consistent with Section 2.4 of the NERC Standard Processes Manual, including: (i) performance-based requirements; (ii) risk-based requirements; and (iii) capability-based requirements. Section 3.2.6 – Elements of a Reliability Standard lists and explains the elements on an FRCC Regional Reliability Standard in a manner that is more consistent with how that information is presented in Section 2.5 of the NERC Standard Processes Manual. The introductory language to the section contains revisions that are intended to improve the text and style of the language.

Section 3.2.7 – Nomination, Modification, or Withdrawal of a Reliability Standard has been revised to introduce the use of a Standard Authorization Request (SAR) in a more direct manner.

3. Section 3.3 - Responsibilities and Roles in the FRCC Regional Reliability Standard Development Process

Section 3.3 contains a number of clarification improvements and updates to the responsibilities and roles of participants in the FRCC standard development process.

Section 3.3.1 – FRCC Board of Directors identifies more specifically FRCC Board of Directors responsibilities, including the responsibility to approve Violation Risk Factors and Violation Severity Levels for FRCC Regional Reliability Standards.

Section 3.3.2 – Registered Ballot Body contains several non-substantive revisions and revisions to clarify what the Registered Ballot Body votes to approve.

Section 3.3.3 – Ballot Pool contains several non-substantive revisions to improve the readability and clarity of the section.

Section 3.3.4 – FRCC Regional Entity Committee and Compliance Forum (RECCF) reflects that the responsibilities formerly held by the FRCC Regional Entity Operating Committee and Regional Entity Planning Committee for oversight of the FRCC standard development process are now exercised by the FRCC RECCF. Section 3.4 has been updated to identify specific responsibilities associated with the oversight activities of the FRCC RECCF.

Section 3.3.5 – FRCC Standards and Registration Staff is revised to include staff responsibilities that are not specifically identified in the current FRCC SDPM, such as responsibilities associated with Violation Risk Factor and Violation Severity Level development, staff reviews of standard development documents, and coordination with the FRCC RECCF.

Section 3.3.6 – Drafting Teams includes additional language regarding the responsibilities associated with the establishment of standard drafting teams and the responsibilities of those standard drafting teams. For example, the revised FRCC SDPM identifies responsibilities associated with drafting of the standard (or definition) and implementation plans, the use of informal and formal consensus building through participation in various industry forums, and so on.

Section 3.3.7 – Governmental Authorities is new in the revised FRCC SDPM and is intended to clarify the role of the applicable governmental authority (i.e. the Commission) to approve FRCC Regional Reliability Standards.

Section 3.3.8 – FRCC Committees, Subcommittees, Working Groups, and Task Forces is updated to refer to the oversight role of the FRCC RECCF. In addition, the section is revised to clarify the relationships between the FRCC RECCF and the FRCC’s technical committees, subcommittees, working groups, and task forces; specifically, that these technical groups may assist with providing technical justification for developing of new Regional Reliability Standards and guidance in overseeing any field tests.

Section 3.3.9 – FRCC Compliance Staff contains minor grammatical changes.

4. Section 3.4 - Process for Developing an FRCC Regional Reliability Standard

Section 3.4 describes the specific process steps for developing an FRCC Regional Reliability Standard. Numerous clarification and process improvements have been made in the revised FRCC SDPM, and the language has been updated throughout to reflect the oversight role of the FRCC RECCF.

Section 3.4.1 (Step 1) introduces language to identify the use of a standard authorization request as the mechanism to start standard development, and additional language is provided to clarify the roles of FRCC staff.

Section 3.4.2 (Step 2) contains minor revisions requiring FRCC staff to notify the FRCC RECCF when a standard request is received.

Section 3.4.3 (Step 3) adds specificity with respect to when standard authorization requests are posted for formal and informal comment periods and drafting team obligations to respond to comments.

Section 3.4.4 (Step 4) provides additional information regarding the FRCC RECCF's responsibilities associated with the disposition of individual standard authorization requests and the solicitation and selection of standard drafting team members.

Section 3.4.5 (Step 5) contains a number of improvements intended to clarify roles and responsibilities and provide for the development of quality standards. The revisions contained in this section provide guidance to the drafting team on standard or definition development, including ensuring that all standards are within the scope of their associated standard authorization request, include all elements, and meet the quality attributes identified in NERC's *Ten Benchmarks for Excellent Reliability Standards* and the criteria for governmental approval. The revisions in this section also introduce FRCC staff responsibilities regarding Violation Risk Factors and Violation Severity Levels, identify methods for conducting industry feedback, and add a requirement to conduct quality reviews prior to posting.

Section 3.4.6 (Step 6) contains revisions clarifying roles and responsibilities and specifying who shall receive notice when a second draft of a standard is posted for comment.

Section 3.4.7 (Step 7) contains revisions to provide for additional clarity regarding the establishment of the ballot pool and joining or withdrawing from the ballot pool.

Section 3.4.8 (Step 8) has been amended in several key respects. First, the process language has been updated to incorporate the use of concurrent posting periods (i.e., comment period, ballot pool formation, and initial ballot during the same time frame). These concurrent posting periods would reduce the time for standards development. Second, the revisions introduce the concept of non-binding polls of Violation Risk Factors and Violation Severity Levels. Lastly, the revisions clarify roles and responsibilities of FRCC staff and the standard

drafting team with respect to responding to stakeholder comments and initial/additional ballot results.

Section 3.4.9 (Step 9) contains updated process language to clarify and include a process step defining final ballot requirements. Guidance is provided to members of the ballot pool on the conduct of the final ballot, and language is added to reflect the involvement and responsibilities of the FRCC RECCF.

Section 3.4.10 (Step 10) contains revisions clarifying the FRCC Board of Directors' responsibilities associated with adoption of an FRCC Regional Reliability Standard and approval of the associated Violation Risk Factors, Violation Severity Levels, and implementation plans. The revised language contains guidance regarding the approval of Violation Risk Factors and Violation Severity Levels. Additionally, the responsibilities of FRCC staff are clarified.

Section 3.4.11 (Step 11) contains minor revisions regarding the submission of FRCC Regional Reliability Standards for NERC and FERC approval.

5. Section 3.5 - Special Procedures

Section V – Special Procedures of the current FRCC SDPM contains processes for urgent action development of standards, standards interpretations, and appeals. The processes for urgent action and appeals are carried forward with minor revisions into Section 3.5 of the revised FRCC SDPM.⁸ New Section 3.5.2 – Regional Definition Development has been added to provide a process for the addition, modification, or retirement of regional definitions.

6. Section 3.6 - Maintenance of the FRCC Regional Reliability Standards and Process

Section 3.6 provides processes for revising the FRCC SDPM (Section 3.6.1) and for the

⁸ The revised FRCC SDPM does not contain a process for interpretations. FRCC currently employs an “Information Request Procedure” which provides assistance to stakeholders in the understanding and application of FRCC Reliability Standards.

five-year review of FRCC Regional Reliability Standards (Section 3.6.2). These topics are currently addressed in brief form in the current FRCC SDPM in Section VI – Maintenance of the FRCC Regional Reliability Standards and Process. These sections are significantly expanded to provide additional clarification with respect to the process requirements and the role of FRCC staff in these areas. For example, Section 3.6.1 now provides for the posting and balloting of changes to the FRCC SDPM. Section 3.6.2 now provides for a “review team” for FRCC Regional Reliability Standards where there are no outstanding governmental directives or unresolved stakeholder issues associated with that standard. This section also provides processes for where the team recommends reaffirmation, modification, or withdrawal of an FRCC Regional Reliability Standard.

E. Section 4.0, References

Section 4.0 has been added to refer to documents that are referenced in the revised FRCC SDPM.

F. Section 5.0, Attachments

Section 5.0 has been added to formally list the attachments to the revised FRCC SDPM. The Attachments consist of the following: (i) Attachment A, the FRCC Regional Reliability Standard Authorization Form; (ii) Attachment B, Process Diagram; and (iii) Attachment C: Development of and Voting of the Registered Ballot Body.

Attachment A revises Appendix A to the current FRCC SDPM to require, in the standard authorization request form, a more detailed description of the industry need for a proposed standard. Additionally, updates have been made to the definitions of the functional entities. The basic flowchart in Appendix B to the current FRCC SDPM has been replaced in the revised FRCC SDPM with a more detailed process flowchart that describes the process steps and

approval flows. Attachment C in the revised FRCC SDPM is carried forward from Appendix C in the current FRCC SDPM. Revisions are made to Section 3 - Ballot Pool Voting to clarify that negative votes without comments, as well as abstentions, are not counted and to state which positions may be voted. This process revision was developed in response to a recommendation of the NERC Standard Process Input Group to “limit negative ballots without comment.”⁹ The requirement to submit comments with a negative vote in order for the vote to be counted is intended to encourage the submission of comments that will provide guidance to drafting teams as to how to revise their work to achieve a consensus standard and is consistent with similar provisions in the NERC Standard Processes Manual. This section has also been revised to provide a process by which a standard achieving a quorum with no negative votes with comments and at least two thirds approval in the initial ballot will be deemed approved by the ballot pool with no need for final ballot. This revision recognizes that the counted ballots in such a case would result in an approval percentage of 100%, and no further work by the drafting team would improve consensus.

G. Section 6.0 – Review and Modification History

A revision and modification log has been added to be consistent with the FRCC template for such documents.

III. FRCC AND NERC APPROVALS FOR THE PROPOSED AMENDMENTS

The revised FRCC SDPM was posted on the FRCC website for regional ballot body comments from January 25, 2016 through March 4, 2016. An initial ballot was conducted from February 22, 2016 through March 4, 2016. The comments received were reviewed by FRCC

⁹ See NERC Member Representatives Committee Standards Process Input Group, *Recommendations to Improve the NERC Standards Development Process* (Apr. 2012), available at http://www.nerc.com/pa/Stand/Standards%20Processes%20Manual%20revisions%20SPIG%20Recommen/Standard_s_Process_Input_Group_04.24.12_ver_8_FINAL.pdf.

Staff and non-substantive revisions were made as appropriate. The document was posted for final ballot from April 12, 2016 through April 23, 2016, where it achieved a 100% quorum and 100% approval. The revised FRCC SDPM was approved by the FRCC Board of Directors on June 30, 2016.

The FRCC SDPM was posted on the NERC website for industry stakeholder comment from July 1, 2016 through August 15, 2016. Two sets of supportive responses and no comments were received. The NERC Board of Trustees approved the amendments to the FRCC SDPM at its November 2, 2016 meeting.

IV. CONCLUSION

NERC respectfully requests that the Commission approve the proposed amendments to the FRCC SDPM as shown in **Attachment 2** to this Petition.

Respectfully submitted,

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November 10, 2016

ATTACHMENT 1:

Amended Florida Reliability Coordinating Council Regional Reliability Standard Development
Process Manual – Clean



FRCC REGIONAL RELIABILITY STANDARD DEVELOPMENT PROCESS MANUAL

FRCC-RE-STD-001

Effective Date: Month Day, Year

Version: 1

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1.0 Purpose

This manual establishes the process for development, revision, withdrawal and approval of Florida Reliability Coordinating Council, Inc. (FRCC) Regional Reliability Standards for the FRCC Region. FRCC Regional Reliability Standards apply to the reliability planning and reliable operation of the Bulk Power System in the FRCC Region. Proposed FRCC Regional Reliability Standards shall be subject to approval by the North American Electric Reliability Corporation (NERC), as the Electric Reliability Organization (ERO) and by the Federal Energy Regulatory Commission (FERC) before becoming mandatory and enforceable under Section 215 of the Federal Power Act. FRCC Regional Reliability Standards, when approved by FERC, shall be made part of the body of the NERC Reliability Standards and shall be enforced upon all applicable bulk power system owners, operators and users within the FRCC Region, regardless of membership in the region.

The FRCC Regional Reliability Standards Development Process is based on providing an open and fair process that ensures all interested and affected parties have an opportunity to participate in the development of FRCC Regional Reliability Standards. Any entity (person, organization, company, government agency, individual, etc.) with a direct and material interest in the reliability of the FRCC Bulk Power System has a right to participate by: a) expressing a position and its basis, b) having that position considered, c) voting on and d) having the right to appeal.

2.0 Background

FRCC is responsible for promoting and assuring the reliability of the interconnected Bulk Power System in Peninsular Florida. FRCC carries out its mission through the development of regional standards and compliance assessment and enforcement of continent-wide and regional standards, coordination of system planning, design and operations, and assessment of reliability.

The Energy Policy Act (EPA) of 2005 (Section 1211) amended the Federal Power Act (FPA) by adding Section 215, Electric Reliability. Specifically regarding standards development and pursuant with Section 215(e) (4) of the FPA, FRCC as a Regional Entity with delegated authority from NERC may propose regional standards to NERC for eventual enforcement within the FRCC region.

NERC Reliability Standards are comprised of both continent-wide and regional standards. The FRCC regional standards apply only to that part of the Eastern Interconnection within the FRCC geographical area.

3.0 FRCC Regional Reliability Standards Development Process

3.1 FRCC Regional Reliability Standard Principles

FRCC Regional Reliability Standards go beyond, add detail to, or implement the NERC Reliability Standards, or cover matters not addressed in the NERC Reliability Standards. FRCC Regional Reliability Standards shall not be inconsistent with or less stringent than the NERC Reliability Standards.

FRCC Regional Reliability Standards are based on the *NERC's Reliability Principles* and *Market Interface Principles*. Each FRCC Regional Reliability Standard shall enable or

Classification: Public

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support one or more of *NERC's Reliability Principles* and must accommodate competitive electricity markets by being consistent with *NERC's Market Interface Principles*.

The FRCC Regional Reliability Standard Development Process defines the fair and open process for development, revision, withdrawal and approval of FRCC Regional Reliability Standards for the FRCC Region and has the following characteristics:

Open Participation – Participation in the FRCC Regional Reliability Standards Development Process is open to all entities that are directly and materially affected by FRCC Reliability Standards or the reliability of the FRCC Bulk Power System. There shall be no financial barriers to participation and participation shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements. All FRCC Regional Reliability Standard Development meetings will be publically noticed on the FRCC website.

Balance – The FRCC Regional Reliability Standard Development Process shall have a balance of interests and shall not be dominated by any two interest categories, individuals, or organizations and no single interest category, individual, or organization shall be able to defeat a matter.

Voting – FRCC shall use a voting formula that allocates each industry sector an equal weight in determining the final outcome of any standard action. The FRCC Regional Reliability Standards Development Process shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Regional Reliability Standard, and/or definition.

Notification of standards development - FRCC shall distribute notices to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a standard. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on FRCC's Standards web page. All notices shall identify a readily available source for further information.

Transparency – The *FRCC Regional Reliability Standards Development Process* shall be transparent to the public.

Consideration of views and objections - Drafting teams shall give prompt consideration to the written views and objections of all participants, providing individualized written responses to those commenting during formal comment periods and those commenting as part of the balloting process. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

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Consensus building - The process shall build and document consensus for each standard, both with regard to the need and justification for the standard and the content of the standard.

Consensus vote - FRCC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, or definition. FRCC shall form a Ballot Pool for each standard action from interested members of its Registered Ballot Body. Approval of any standard action requires:

- A quorum, which is established by at least two thirds of the members of the Ballot Pool submitting a response with an affirmative vote, a negative vote, or an abstention; and
- A two-thirds majority of the weighted segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

Timeliness – Development of standards shall be timely and responsive to new and changing priorities for reliability of the FRCC Bulk Power System.

3.2 FRCC Regional Reliability Standard Elements

3.2.1 Definition

A FRCC Regional Reliability Standard defines certain obligations or requirements of all owners, operators and users of the FRCC Bulk Power System regardless of membership in the FRCC. The obligations or requirements must be material to reliability and measurable. A Reliability Standard is defined in the NERC Glossary of Terms used in NERC Reliability Standards (effective July 1, 2016) as:

A requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk-Power System. The term includes requirements for the operation of existing Bulk-Power System facilities, including cybersecurity protection, and the design of planned additions or modifications to such facilities to the extent necessary to provide for Reliable Operation of the Bulk-Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

FRCC Regional Reliability Standards go beyond, add detail to, or implement the NERC Reliability Standards, or cover matters not addressed in the NERC Reliability Standards. FRCC Regional Reliability Standards shall not be inconsistent with or less stringent than NERC Reliability Standards.

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3.2.2 Reliability Principles

FRCC Regional Reliability Standards are based on the *NERC Reliability Principles* that define the foundation of reliability for North American Bulk Power Systems. Each FRCC Regional Reliability Standard shall enable or support one or more of the *NERC Reliability Principles*, thereby ensuring that each standard serves a purpose in support of reliability of the FRCC Bulk Power System. Each FRCC Regional Reliability Standard shall also be consistent with all of the *NERC Reliability Principles*, thereby ensuring that no standard undermines reliability through an unintended consequence.

3.2.3 Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all FRCC Regional Reliability Standards shall be consistent with the *NERC Market Interface Principles*. Consideration of the Market Interface Principles is intended to ensure that FRCC Regional Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

3.2.4 Characteristics

A FRCC Regional Reliability Standard shall have the following characteristics:

Material to Reliability - A FRCC Regional Reliability Standard shall be material to the reliability of the FRCC Bulk Power System. If the reliability of the FRCC Bulk Power System could be compromised without a particular standard or by a failure to comply with that standard, then the standard is material to reliability.

Measurable - A FRCC Regional Reliability Standard shall establish technical or performance requirements that can be practically measured.

Relative to NERC Reliability Standards - A FRCC Regional Reliability Standard must go beyond, add detail to, or implement NERC Reliability Standards, or cover matters not addressed in NERC Reliability Standards.

3.2.5 Types of Reliability Requirements

Although FRCC Regional Reliability Standards have a common format and process, several types of Reliability Standards requirements may exist, each with a different approach to measurement:

Performance-based requirements define a specific reliability objective or outcome that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends.

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Risk-based requirements define actions of entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions.

Capability-based requirements define capabilities needed to perform reliability functions and can be measured by demonstrating that the capability exists as required.

The body of FRCC reliability requirements, combined with the NERC reliability requirements, collectively provides a defense-in-depth strategy supporting reliability of the FRCC Bulk Power System.

3.2.6 Elements of a Reliability Standard

A FRCC Regional Reliability Standard includes many elements designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the FRCC Bulk Power System. Elements that are considered mandatory and enforceable are identified below. The elements of a Reliability Standard include the following:

Title: A brief, descriptive phrase identifying the topic of the standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the standards.

Purpose: The reliability outcome achieved through compliance with the requirements of the standard.

Applicability (mandatory and enforceable): Provides clear identification of the functional classes of entities responsible for complying with the standard, noting any specific additions or exceptions.

If not applicable to the entire FRCC, then a clear identification of the portion of the FRCC Bulk Power System to which the standard applies will be made. Any limitation on the applicability of the standard based on electric facility requirements should be described.

Effective Dates (mandatory and enforceable): Identification of when each requirement becomes effective within the jurisdiction of the FRCC.

Requirement (mandatory and enforceable): An explicit statement that identifies the functional entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each requirement shall be a statement for which compliance is mandatory.

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Measure: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated requirement. Each requirement shall have at least one measure. Each measure shall clearly refer to the requirement(s) to which it applies.

Evidence Retention: Identification, for each requirement in the standard, of the entity that is responsible for retaining evidence to demonstrate compliance, and the duration for retention of that evidence.

Application Guidelines: Guidelines to support the implementation of the associated standard.

Procedures: Procedures to support implementation of the associated standard.

Time Horizon: The time period related to when a requirement takes place or how much time there may be to mitigate a violation of the associated requirement.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated standard.

Additional Compliance Information: Any other information related to assessing compliance such as the criteria or periodicity for filing specific reports.

Violation Risk Factors and Violation Severity Levels: Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the violation of a requirement in an approved FRCC Regional Reliability Standard. Each requirement in each Reliability Standard has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with FRCC Standards and Registration staff, at the same time as the associated Reliability Standard, but are not part of Reliability Standard. The FRCC Board of Directors is responsible for approving VRFs and VSLs.

Violation Risk Factors (VRFs): VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.

Violation Severity Levels (VSLs): VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple “degrees” of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.

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3.2.7 Nomination, Modification, or Withdrawal of a Regional Standard

Any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, shall be allowed to request that a FRCC Regional Reliability Standard be developed, modified, or withdrawn. Additionally, any interested party or any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System shall be allowed to request that a FRCC Regional Reliability Standard be developed, modified, or withdrawn.

A FRCC Standard Authorization Request (SAR) is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified standards or the benefit of retiring one or more approved standards. Any entity or individual may propose the development of a new or modified standard, or may propose the retirement of a standard, by submitting a completed SAR to the FRCC Standards and Registration staff at FRCCStandard@frcc.com.

Each SAR that proposes a “new” standard, should be accompanied with a technical justification that includes, as a minimum, a discussion of the reliability-related impact of not developing the new standard, and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.

3.3 Responsibilities and Roles in the FRCC Regional Reliability Standard Development Process

3.3.1 FRCC Board of Directors

The FRCC Board of Directors (BOD) shall consider for adoption FRCC Regional Reliability Standards, definitions, and associated implementation plans that have been developed and approved by the processes identified in this manual. In addition, the board shall consider for approval, VRFs and VSLs associated with each approved standard. Once the Board adopts a FRCC Regional Reliability Standard, or definition, or once the Board approves VRFs or VSLs, the Board shall direct FRCC Standards and Registration staff to file the document(s) with NERC for approval with the applicable regulatory authorities.

3.3.2 Registered Ballot Body

The Registered Ballot Body votes to approve FRCC Regional Reliability Standards, definitions, and associated implementation plans. The Registered Ballot Body comprises all entities and individuals that qualify for one of the FRCC Industry Sectors as defined in Section 1.2 of the FRCC Bylaws, and are registered with FRCC as potential ballot participants in the voting on standards. FRCC membership is not a requirement to participate in the development of, and voting on, FRCC Regional Reliability Standards. Any entity or individual that has a material interest in the reliability of the FRCC Bulk Power System shall be allowed to register as potential ballot participants in the Registered Ballot Body. (See Attachment C) Each member of the Registered Ballot Body is eligible to join the Ballot Pool for each standard action.

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3.3.3 Ballot Pool

Each standard action has its own Ballot Pool formed of interested members of the Registered Ballot Body. The Ballot Pool comprises those members of the Registered Ballot Body that respond to a pre-ballot survey participation request for that particular standard action. The Ballot Pool will vote to approve each standard action. The Ballot Pool remains in place until all balloting related to that standard action is complete.

3.3.4 FRCC Regional Entity Committee and Compliance Forum (RECCF)

The FRCC RECCF, a balanced stakeholder committee, is responsible for managing the standards processes for the development of standards, VRFs, VSLs, and definitions in accordance with this manual. The responsibilities of the FRCC RECCF are defined in detail in the committee scope document.

Per Section 3.4 of this manual, the FRCC RECCF has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The FRCC RECCF may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for the NERC’s *Benchmarks for Reliability Standards*, or to meet the criteria for governmental approval, however the FRCC RECCF shall not direct a drafting team to change the technical content of a draft standard. The FRCC RECCF shall meet at regularly scheduled intervals (either in person, or by other means). FRCC RECCF meetings where topics related to the Standards Development Process are being discussed or acted on will be publically posted on the FRCC website.

3.3.5 FRCC Standards and Registration Staff

The FRCC Standards and Registration staff, led by the Manager of Standards and Registration, is responsible for administering FRCC’s Reliability Standards Processes in accordance with this manual and adhering to the requirements identified in the *NERC Regional Reliability Standards Evaluation Procedure*. The FRCC Standards and Registration staff provides support to the FRCC RECCF in managing the standards processes and supporting the work of all drafting teams. The FRCC Standards and Registration staff work to ensure the integrity of the standards processes and consistency of quality and completeness of the Reliability Standards. The FRCC Standards and Registration staff facilitates all steps in the development of standards, definitions, and associated implementation plans. The FRCC Standards and Registration staff work with drafting teams in developing VRFs and VSLs for each standard.

The FRCC Standards and Registration staff shall coordinate a quality review of the “final draft” of the Reliability Standard, its implementation plan, and VRFs and VSLs to assess whether the documents are within the scope of the associated SAR, whether the standard is clear and enforceable as written, and whether the standard meets the criteria specified in the NERC and FERC guidelines. This review shall normally be completed within thirty (30)

calendar days¹ of receipt of the final version of the documents from the Standard Drafting Team (SDT). The detailed results of this review shall be provided to the SDT for consideration. The SDT shall consider the results of the quality review, decide upon appropriate changes, and recommend to the FRCC RECCF whether the documents are ready for formal posting and balloting.

If the FRCC RECCF agrees that the proposed Reliability Standard, implementation plan, and VRFs and VSLs pass this review, the FRCC RECCF shall authorize posting for a formal comment period, ballot (for the standard and implementation plan), and non-binding poll (for VRFs and VSLs) as soon as the work flow will accommodate.

If the FRCC RECCF finds that any of the documents do not meet the specified criteria, the FRCC RECCF shall remand the documents to the SDT for additional work.

If the standard is outside the scope of the associated SAR, the SDT shall be directed to either revise the standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the standard is not clear and enforceable as written, or if the standard or its VRFs and/or VSLs do not meet the specified criteria, the standard shall be returned to the SDT with specific identification of any requirement that is deemed to be unclear or unenforceable as written.

The FRCC Standards and Registration staff is responsible for presenting standards, and definitions to the FRCC Board of Directors for adoption. When presenting standards-related documents to the FRCC Board of Directors for adoption or approval, the FRCC standards and Registration staff shall report the results of the associated stakeholder ballot, including identification of any unresolved minority stakeholder issues.

3.3.6 Drafting Teams

The FRCC RECCF shall appoint industry subject matter experts to drafting teams to work with stakeholders in developing and refining SARs, standards, VRFs, VSLs and definitions.

Each drafting team consists of a group of technical experts that work cooperatively with the support of the FRCC Standards and Registration staff. The technical experts provide subject matter expertise and guide the development of the technical aspects of the standard. The technical experts maintain authority over the technical details of the standard. Each drafting team appointed to develop a standard is responsible for following the processes identified in this manual from the inception of the assigned project through the final acceptance of that project by applicable governmental authorities.

¹ Time periods specified in this manual may be extended as deemed appropriate by FRCC Staff. When business days are specified, this provision could be used to take into account different US holiday schedules. When calendar days are specified, this provision could be used to take into account due dates that fall on a weekend.

Collectively, each drafting team will:

- Draft proposed language for the Reliability Standards, definitions, and associated implementation plans.
- Solicit, consider, and respond to comments related to the specific standards development project.
- Participate in industry forums to help build consensus on the draft Reliability Standards, definitions, and associated implementation plans.
- Assist in developing the documentation used to obtain approval and subsequent filing of the Reliability Standards, definitions and associated implementation plans.

The FRCC Standards and Registration staff shall provide a member to support the team with technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. The individuals provided by the FRCC Standards and Registration staff serve as advisors to the drafting team and do not have voting rights. The FRCC RECCF may also supplement the membership of a standard drafting team at any time to ensure the necessary competencies and diversity of views are maintained throughout the standard development effort. All drafting teams report to the FRCC RECCF.

3.3.7 Governmental Authorities

The Federal Energy Regulatory Commission (FERC) in the United States of America has the authority to approve each new, revised or withdrawn Reliability Standard, definition, VRF, and VSL following adoption or approval by the NERC Board of Trustees.

3.3.8 FRCC Committees, Subcommittees, Working Groups, and Task Forces

FRCC's technical committees, subcommittees, working groups, and task forces may provide technical research and analysis used to justify the development of new standards and may provide guidance, when requested by the FRCC RECCF, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces may provide feedback to drafting teams during both informal and formal comment periods.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified standards or requirements with the FRCC Standards and Registration staff for use in identifying the need for new standards projects.

3.3.9 FRCC Compliance Staff

The FRCC Compliance staff provide input and comments during the standard development process to ensure the requirements are not ambiguous, that measures are clear and effective and that the compliance elements of a standard can be practically implemented.

3.4 Process for Developing an FRCC Regional Reliability Standard

3.4.1 Step 1 – Request a new FRCC Regional Reliability Standard or modification to, or withdrawal of an existing FRCC Regional Reliability Standard

Step 1a - A Standard Authorization Request (SAR) to develop, modify or withdraw a FRCC Regional Reliability Standard shall be submitted to the FRCC Standards and Registration staff (via email to FRCCStandard@frcc.com) by any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, or any interested party or any entity that is directly and materially affected by reliability of the FRCC Bulk Power System.

Step 1b - The FRCC Standards and Registration staff shall acknowledge receipt of the request within fifteen (15) calendar days of its receipt.

3.4.2 Step 2 –FRCC Regional Reliability Standard Request

The FRCC Standards and Registration staff shall notify the FRCC RECCF of the request.

3.4.3 Step 3 – Posting of FRCC Regional Reliability Standard Request

Step 3a - The SAR will be posted for notification and comment on the FRCC public website for a period of fifteen (15) calendar days.

- For SARs that address the development of a new standard, the SAR will be posted for a fifteen (15) calendar day formal comment period.
- For SARs that are limited to modifications to or withdrawal of existing standards, the SAR will be posted for a fifteen (15) calendar day informal comment period.

The intent of the formal comment periods is to solicit very specific feedback on the SAR and technical justification. A written response to each comment received is required.

Feedback gathered from the informal comment period shall be publicly posted and, while a written response to each individual comment received is not required, a summary response that identifies how the comments were considered is required.

A notice of the posting for comment shall be sent to (1) the Registered Ballot Body Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.

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Step 3b - Following the comment period, the FRCC Standards and Registration staff shall present the SAR, supporting documents, industry comments with resolution to the FRCC RECCF for review.

3.4.4 Step 4 – Acceptance of a FRCC Regional Reliability Standard Request

Step 4 - The FRCC RECCF reviews the SAR, supporting documents, industry comments and resolutions and takes one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requester and FRCC Standards and Registration staff for additional work. The FRCC RECCF will provide a written explanation for the remand.
- Reject the SAR. If the FRCC RECCF rejects a SAR, a written explanation for rejection will be provided to the requester within ten (10) calendar days of the rejection decision.
- Delay action on the SAR pending development of a technical justification for the proposed project.

The review decision will be publically posted.

Step 4a - If accepted, the FRCC RECCF will seek industry volunteers, establish the SDT to further develop the SAR (if necessary), draft the Regional Reliability Standard and to address comments submitted during the posting periods. The FRCC Standards and Registration staff will publicly post a request for fifteen (15) calendar days soliciting industry volunteers to participate on the SDT.

Step 4a.1 - FRCC Standards and Registration staff will present a list of qualified candidates to the FRCC RECCF for potential assignment to the SDT.

Step 4b - If the request is rejected, the FRCC Standards and Registration staff will send notification to the entity making the request.

Step 4c - If the FRCC RECCF is presented with a SAR that proposes developing a new standard but does not have a technical justification upon which the standard can be developed, the FRCC RECCF shall delay action and direct the FRCC Standards and Registration staff to post the SAR for a thirty (30) calendar day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the FRCC RECCF shall solicit assistance from FRCC’s technical committees or other industry experts in providing that foundation before authorizing development of the associated standard.

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3.4.5 Step 5 – Drafting and Posting of a FRCC Regional Reliability Standard

Step 5a - The FRCC RECCF will assign a SDT, within sixty (60) calendar days of acceptance of the request, to develop, in a timely manner, a draft FRCC Regional Reliability Standard that will address the accepted request.

Step 5b - The SDT shall develop a project schedule and report progress, to the FRCC RECCF, against that schedule as requested by the FRCC RECCF.

The SDT, shall consider all comments received on the posting of the SAR and shall develop a draft FRCC Regional Reliability Standard and corresponding implementation plan.

The SDT shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual with a goal of meeting the quality attributes identified in NERC’s *Ten Benchmarks for Excellent Reliability Standards* and criteria for governmental approval. The team shall document its justification for the requirements in its proposed standard by explaining how each meets these criteria.

As the SDT drafts a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated standard or standards. A single implementation plan may be used for more than one standard. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the requirements.
- Whether approval of the proposed standard will necessitate any conforming changes to any already approved standards – and identification of those standards and requirements.
- The functional entities that will be required to comply with one or more requirements in the proposed standard.

The SDT shall work with FRCC Standards and Registration staff in developing a set of VRFs and VSLs that meet the latest criteria established by the NERC and governmental authorities. The SDT shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet these criteria. FRCC Standards and Registration staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the SDT has finalized its standard, implementation plan, VRFs and VSLs, the SDT should seek stakeholder feedback on its preliminary draft documents.

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The SDT may use a variety of methods to collect stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods, webinars, industry meetings, workshops, or other mechanisms. Informal comment periods, if used, shall have a minimum duration of fifteen (15) calendar days. Information gathered from informal comment forms shall be publicly posted and, while drafting teams are not required to provide a written response to each individual comment received, drafting teams must post a summary response that identifies how it used comments submitted by stakeholders. The intent is to gather stakeholder feedback on a “working document” before the document reaches the point where it is considered the “final draft.”

The FRCC Standards and Registration staff shall conduct a quality review of the new or modified standard, its associated VRFs and VSLs, and implementation plan prior to each posting.

Step 5c - The initial formal comment period, and if necessary subsequent formal comment periods, shall be for at least thirty (30) calendar day duration and shall start after the SDT has posted its consideration of stakeholder comments and any conforming changes to the associated standard.

The intent of the formal comment periods is to solicit very specific feedback on the final draft of the standard, VRFs, VSLs, and implementation plan. If stakeholders disagree with some aspect of the proposed set of products, comments provided should suggest specific language that would make the product acceptable to the stakeholder.

Notice of the posting will go out to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek comments.

Comments shall be submitted (via email) to the FRCC Standards and Registration staff (FRCCStandard@frcc.com). All comments are due by the close of business on the posted due date. If the comment due date falls on a weekend or nationally recognized holiday, the comments shall be due by the close of business on the next regularly scheduled business day.

3.4.6 Step 6 – Standards Drafting Team Review of Comments

The FRCC Standards and Registration staff will forward all comments to the SDT for consideration. All timely comments will be considered.

The SDT shall review the comments received and revise the draft FRCC Regional Reliability Standard and/or implementation plan as needed. The SDT shall develop written responses to each comment received.

All responses to the submitted comments will be documented and posted on the FRCC public website. If needed, a revised draft of the FRCC Regional Reliability Standard shall be posted for another comment period.

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Notice of the posting will go out to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek comments.

Based on comments received to the posting, appropriate portions of **Step 5** will be repeated as necessary until the SDT believes the draft FRCC Regional Reliability Standard is ready to submit to the Ballot Pool for approval.

3.4.7 Step 7 –Establishment of Ballot Pool

The FRCC Standards and Registration staff shall establish a Ballot Pool during the first fifteen (15) calendar days of the first thirty (30) calendar day formal comment period. The FRCC Standards and Registration staff shall post the proposed standard, its implementation plan, VRFs, and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised standard proposed for approval and to solicit participants for the associated ballot pool. One member from each entity of the Registered Ballot Body is eligible to join each Ballot Pool to vote on a new or revised Reliability Standard and its implementation plan. Members who join the Ballot Pool to vote on the new or revised standard and its implementation plan are automatically entered into the ballot pool to participate in the non-binding poll of the associated VRFs and VSLs.

Any member of the Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that standard action has ended. The FRCC Manager of Standards and Registration may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any approved deviation shall be documented and noted to the FRCC RECCF.

3.4.8 Step 8 Initial – Ballot of the new or revised FRCC Regional Reliability Standard and Non-Binding Poll of VRFs and VSLs

The FRCC Standards and Registration staff shall announce the opening of the initial ballot window and the non-binding poll of VRFs and VSLs. The ballot window and non-binding poll window shall both take place during the last ten (10) calendar days of the thirty (30) calendar day formal comment period. This allows all stakeholders the opportunity to comment on the final draft of each proposed standard, even those stakeholders who are not members of the Ballot Pool.

The ballot and non-binding poll shall be conducted electronically. The voting and polling windows shall each be a period of ten (10) calendar days but both shall be extended, if needed, until a quorum is achieved. During a ballot window, FRCC shall not sponsor or facilitate public discussion of the standard action under ballot.

The SDT shall consider every stakeholder comment submitted either in response to a formal comment period or submitted with a ballot that includes a proposal for a specific modification

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to the standard or its implementation plan posted for comment and approval. The SDT shall be responsive to all comments by providing a written response and indicating whether the drafting team adopted or rejected any recommendations.

If stakeholders submit comments that indicate a specific improvement to one or more of the VRFs or VSLs and the modification would improve consensus without violating the criteria for setting VRFs and VSLs, then the SDT, working with FRCC Standards and Registration staff, shall consider and respond to each comment, and shall make conforming changes to reflect those comments. There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard; however, if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

All comments submitted and the responses to those comments shall be publicly posted.

See Attachment C *Development of and Voting of the Registered Ballot Body* for ballot approval and quorum requirements.

If a stakeholder or ballotter proposes a significant revision to the standard during the formal comment period or concurrent initial ballot that will improve the quality, clarity, or enforceability of that standard then the SDT shall make such revisions and post the revised standard (that has been significantly changed from the previous ballot) for another public comment period and an additional ballot.

The SDT shall address comments submitted during additional ballot periods (comments submitted from stakeholders during the open formal comment period and comments submitted with negative ballots) in the same manner as for the Initial Ballot. Once the SDT has a draft standard that has been through an “additional ballot” and the team believes that no additional significant modifications are needed, or the SDT has reached a point where it has made a good faith effort at resolving applicable objections, the standard shall be posted for a Final Ballot.

3.4.9 Step 9 - Final Ballot - of the new or revised FRCC Regional Reliability Standard

In the Final Ballot, members of the ballot pool shall again be presented the proposed standard (that has not been significantly changed from the previous ballot) along with the reasons for negative votes, the responses, and any resolution of the differences. An insignificant revision is a revision that does not change the scope, applicability, or intent of any requirement and includes but is not limited to things such as correcting the numbering of a requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a requirement for improved clarity. Where there is a question as to whether a proposed modification is “substantive” the FRCC RECCF shall make the final determination. There is no formal comment period concurrent with the Final Ballot and no obligation for the SDT to respond to any comments submitted during the Final Ballot.

All members of the Ballot Pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the Ballot Pool who did not respond to the prior ballot shall be

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permitted to vote in the Final Ballot. In the Final Ballot, votes shall be counted by exception only. Members of the ballot pool for the Final Ballot may indicate a revision to their original vote otherwise their vote shall remain the same as in their prior ballot.

There are no limits to the number of “additional” public comment periods and ballots that can be conducted to result in a standard that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The FRCC RECCF has the authority to conclude this process or a particular standards action if it becomes obvious that the SDT cannot develop a standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted segment approval percentage.

The FRCC Standards and Registration staff shall post the final outcome of the ballot process. If the standard is approved, the consensus standard shall be posted and presented to the Board of Directors for adoption by the FRCC.

3.4.10 Step 10 – Adoption of FRCC Regional Reliability Standards and Implementation Plans by the FRCC Board of Directors

At a regular or special meeting, the FRCC Board of Directors may consider adoption of the proposed FRCC Regional Reliability Standard and the associated implementation plan that have been approved by the Registered Ballot Pool. A FRCC Regional Reliability Standard and the associated implementation plan submitted for adoption by the FRCC Board of Directors must be posted for notification and comment on the FRCC public website at least ten (10) calendar days prior to action by the FRCC Board of Directors. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator. The FRCC Board of Directors shall consider the comments received, the responses provided, and any dissenting opinions. The FRCC Board of Directors shall adopt or reject a FRCC Regional Reliability Standard and the associated implementation plan as submitted, but may not modify the proposed FRCC Regional Reliability Standard. If the FRCC Board of Directors chooses not to adopt a FRCC Regional Reliability Standard, it shall provide its reasons for such decision and the decision will be posted on the FRCC public website. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.

The board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:

- FRCC Standards and Registration staff shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs.
- FRCC Standards and Registration staff shall present a set of recommended VRFs and VSLs that considers the views of the SDT, stakeholder comments received on the draft

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VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

3.4.11 Step 11 – Submission to the ERO/NERC and FERC

Once the FRCC Regional Reliability Standard and the associated implementation plan are adopted by the FRCC Board of Directors, the FRCC Standards and Registration staff shall submit the FRCC Regional Reliability Standard, the associated implementation plan and all supporting documents to the NERC for approval. Upon approval by the NERC, all documentation shall be submitted by the NERC to FERC for approval. If the NERC or FERC rejects the FRCC Regional Reliability Standard, the FRCC Board of Directors will determine if the standard is to be sent back to the FRCC RECCF to incorporate their comments or to take no further action on the standard. A FRCC Regional Reliability Standard that is adopted by the FRCC Board of Directors, approved by the NERC and FERC, shall become effective on a date designated by FERC.

3.5 Special Procedures

3.5.1 Urgent Action

Under certain conditions, the entity making the request or the FRCC RECCF may designate a proposed or revised FRCC Regional Reliability Standard as requiring urgent action. Urgent action may be appropriate when a delay in implementing a proposed or revised FRCC Regional Reliability Standard will materially impact reliability of the Bulk Power System in the FRCC Region. The FRCC RECCF must use its judgment carefully to ensure an urgent action is truly necessary and not simply an expedient way to change or implement a FRCC Regional Reliability Standard.

The entity making the request, or the FRCC RECCF, will prepare a draft of the proposed FRCC Regional Reliability Standard and submit it to the FRCC Standards and Registration staff for urgent action. The submission must include a justification for the urgent action. FRCC Standards and Registration staff shall immediately without delay initiate the *FRCC Regional Reliability Standards Development Process* by posting the draft as specified in Step 5. The posting shall be a minimum of ten (10) calendar days before the Registered Ballot Body can consider the draft for approval. All comments received during the posting will be considered. Once approved by the Registered Ballot Body, the proposed urgent FRCC Regional Reliability Standard will be sent to the FRCC Board of Directors for adoption.

A FRCC Regional Reliability Standard that is adopted by the FRCC Board of Directors, as an urgent action shall have a termination date specified that shall not exceed one hundred eighty (180) calendar days from the approved date. Should there be a need to make the FRCC Regional Reliability Standard permanent, the replacement FRCC Regional Reliability Standard would be required to go through the full standards development process.

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An urgent action FRCC Regional Reliability Standard that expires may be renewed by the FRCC Board of Directors using the urgent action process again, in the event a permanent FRCC Regional Reliability Standard has not been adopted. In determining whether to authorize the extension of an urgent action FRCC Regional Reliability Standard the FRCC Board of Directors will request the FRCC RECCF to provide a recommendation to the Board. The FRCC RECCF shall consider the impact to the reliability of the FRCC Bulk Power System of not continuing the FRCC Regional Reliability Standard and consideration will be given to whether expeditious progress is being made toward a permanent replacement.

The FRCC RECCF shall not request the FRCC Board of Directors to extend an urgent action FRCC Regional Reliability Standard if there is insufficient progress toward adopting a permanent replacement FRCC Regional Standard or if the FRCC RECCF lack confidence that a reasonable completion date is achievable. The intent is to ensure that an urgent action FRCC Regional Reliability Standard does not in effect take on a degree of permanence due to the lack of an expeditious effort to develop a permanent replacement FRCC Regional Reliability Standard. With these principles, there is no pre-determined limit on the number of times an urgent action may be renewed.

Each urgent action FRCC Regional Reliability Standard renewal shall be effective only upon adoption by the FRCC Board of Directors, and approval by NERC and FERC.

3.5.2 Regional Definition Development

NERC maintains a glossary of approved terms, entitled the “Glossary of Terms Used in NERC Reliability Standards.” The glossary includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. There are two sections to the glossary. The first section includes definitions for terms used in continent-wide standards, and the second section includes definitions for terms used in Regional standards that have been adopted by the NERC Board of Trustees. The *Glossary of Terms* is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a FRCC Regional Reliability Standard.

- Anyone can use a SAR to submit a request to add, modify, or retire a defined term.
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

The following considerations should be made when considering proposals for new or revised definitions:

- Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by another Region, the same definition should be adopted if needed to support an FRCC Regional Reliability Standard.

- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the *Glossary of Terms Used in NERC Reliability Standards*.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved standards.
- When practical, where the North American Energy Standards Board (NAESB) has a definition for a term, the drafting team shall use the same definition to support a NERC standard.

Any definition that is balloted separately from a proposed new or modified standard or from a proposal for retirement of a standard shall be accompanied by an implementation plan.

If a SAR is submitted to the FRCC Standards and Registration staff with a proposal for a new or revised definition, the FRCC RECCF shall consider the urgency of developing the new or revised definition and may direct FRCC Standards and Registration staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a standard already under revision by a drafting team, the FRCC RECCF may direct the drafting team to add the term to the scope of the existing project. Any proposal for a new or revised definition shall be processed in accordance with Section III. *Steps in Developing a FRCC Regional Reliability Standard* of this procedure.

3.5.3 Appeals

Any member of the FRCC, or group within the FRCC, or any entity that is directly and materially affected by reliability of the FRCC Bulk Power System, and who feel they have been or will be adversely affected by any procedural action or inaction related to the development, approval, revision, or withdrawal of a FRCC Regional Reliability Standard shall have the right to appeal. This appeals process applies only to the *FRCC Regional Reliability Standards Process* as defined in this document.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made within thirty (30) calendar days of the date of the action purported to cause the adverse effect. The final decisions of any appeal shall be documented in writing and posted on the FRCC public website. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants:

3.5.3.1 Level 1 Appeal

Level 1 is the required first step in this appeals process. The appellant submits to the FRCC Manager of Standards and Registration a complaint in writing that describes the substantive or procedural action associated with a FRCC Regional Reliability Standard or the *FRCC Regional Reliability Standards Process*. The appellant must describe in the complaint, the actual or potential adverse impact to the appellant. Assisted by any necessary staff and committee resources, the FRCC Manager of Standards and Registration shall prepare a written response addressed to the appellant as soon as practical but not more than forty-five (45) calendar days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response will be made a part of the record associated with the FRCC Regional Reliability Standard.

3.5.3.2 Level 2 Appeal

If after the Level 1 Appeal, the appellant remains unsatisfied with the resolution, notification shall be made in writing to the FRCC Manager of Standards and Registration. Within thirty (30) calendar days of receiving the notification, the FRCC Manager of Standards and Registration shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the FRCC Board of Directors. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The FRCC Manager of Standards and Registration shall post on the FRCC public website the notice of the Level 2 appeal and other relevant materials. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator. At least fifteen (15) calendar days' notice of the meeting of the Level 2 Appeals Panel will be made. In addition to the appellant, any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System, and who is directly and materially affected by the substantive or procedural action referenced in the complaint shall be heard by the panel.

The Level 2 Appeals Panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The Level 2 Appeals Panel may in its decision find for the appellant and remand the issue to the FRCC RECCF for resolution with a statement of the issues and facts in regard to which fair and equitable action was not taken. The Level 2 Appeals Panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections.

The Level 2 Appeals Panel may not, however, revise, approve, disapprove, or adopt a FRCC Regional Reliability Standard, as these responsibilities remain with the FRCC Board of Directors. The actions of the Level 2 Appeals Panel shall be posted on the

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FRCC public website. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.

3.6 Maintenance of the FRCC Regional Reliability Standards and Process

3.6.1 Requests to Revise the FRCC Regional Reliability Standard Development Process

Any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, or any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System may submit a written request to modify the *FRCC Regional Reliability Standard Development Process Manual*. The FRCC Standards and Registration staff shall oversee the handling of the request. The FRCC Standards and Registration staff shall prioritize all requests, merge related requests, and respond to each requestor within thirty (30) calendar days.

The FRCC Standards and Registration staff shall post the proposed revisions for a thirty (30) calendar day formal comment period. Based on the degree of consensus for the revisions, the FRCC Standards and Registration staff shall:

- a.) Submit the revised process or processes for Ballot Pool approval;
- b.) Repeat the posting for additional inputs after making changes based on comments received;
- c.) Remand the proposal to the requestor for further work; or
- d.) Reject the proposal.

The Registered Ballot Body shall be represented by a Ballot Pool. The ballot procedure shall be the same as that defined for approval of a FRCC Regional Reliability Standard, including the use of subsequent ballots (additional or Final Ballots), as necessary. If the proposed revision is approved by the Ballot Pool, the FRCC Standards and Registration staff shall submit the revised procedure to the FRCC Board of Directors for adoption. The FRCC Standards and Registration staff shall submit to the board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and applicable governmental authorities.

3.6.2 Five-Year Review of FRCC Regional Reliability Standards

Each FRCC Regional Reliability Standard developed through *FRCC Regional Reliability Standard Development Process* shall be reviewed at least once every five years from the effective date of the standard.

If a FRCC Regional Reliability Standard is nearing its five-year review and has issues that need resolution, then a FRCC Regional Reliability Standard Development project will be initiated for the complete review and associated revision of that standard that includes

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addressing all outstanding governmental directives and all unresolved issues identified by stakeholders. The standard development project will be processed in accordance with Section III. *Steps in Developing a FRCC Regional Reliability Standard* of this procedure.

If a FRCC Regional Reliability Standard is nearing its five-year review and there are no outstanding governmental directives or unresolved stakeholder issues associated with that standard, then a FRCC Regional Reliability Standard Development project will be initiated solely for the “five-year review” of that standard and will be addressed by the following process.

For a project that is focused solely on the five-year review, the FRCC RECCF shall appoint a review team of subject matter experts to review the FRCC Regional Reliability Standard and recommend whether the standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a thirty (30) calendar day formal stakeholder comment period and shall provide those stakeholder comments to the FRCC RECCF for consideration.

- If a review team recommends reaffirming a FRCC Regional Reliability Standard, the FRCC RECCF shall submit the reaffirmation to the FRCC Board of Directors for concurrence. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying or withdrawing a FRCC Regional Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the FRCC RECCF for acceptance as a new project. Each existing standard recommended for modification or withdrawal shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the standard is approved by its ballot pool, adopted by the FRCC Board of Directors, and approved by applicable governmental authorities.

In the case of reaffirmation of a FRCC Regional Reliability Standard, the standard shall remain in effect pending the results of the next five-year review or until the standard is otherwise modified or withdrawn by a separate action.

3.6.3 Filing of FRCC Regional Standards with Regulatory Agencies

All adopted FRCC Regional Reliability Standards will be filed with the NERC Board of Trustees for adoption and subsequently filed with FERC for approval.

4.0 References

Ten Benchmarks for Excellent Reliability Standards
FRCC Bylaws
NERC Regional Standards Review Procedure
NERC Glossary of Terms Used in Reliability Standards
NERC Regional Reliability Standards Evaluation Procedure

5.0 Attachments

Attachment A: FRCC Regional Reliability Standard Authorization Form
Attachment B: Process Diagram
Attachment C: Development of and Voting of the Registered Ballot Body

6.0 Review and Modification History

Review and Modification Log			
Date	Version Number	Description of Review or Modification	Sections Affected
TBD	1	Revised Procedure/New Template	All
9/25/2007	0	Amended	All
10/24/2006	0	Amended	All
7/25/2006	0	Amended	All
3/2/2006	0	New Process	All

Attachment A



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FRCC Regional Reliability Standard Request Form

Email completed form to FRCCStandard@frcc.com

Title of Standard
Request Date

<i>Requestor Information</i>	TYPE <i>(Check a box for each one that applies)</i>
Name	<input type="checkbox"/> New Standard
Primary Contact	<input type="checkbox"/> Revision to existing Standard
Telephone Fax	<input type="checkbox"/> Withdrawal of existing Standard
Email	<input type="checkbox"/> Urgent Action

Purpose (Describe the purpose of the standard – what the standard will achieve in support of reliability)

Industry Need (Provide at a minimum, a discussion of the reliability-related impact of not developing the new standard, and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.)

Brief Description (Describe the proposed standard in sufficient detail to clearly define the scope in a manner that can be easily understood by others).

FRCC Regional Reliability Standard Request Form (cont.)

The Standard will Apply to the Following Functions (Check box for each one that applies)

<input type="checkbox"/>	Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.
<input type="checkbox"/>	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within its balancing authority and supports system frequency in real time.
<input type="checkbox"/>	Planning Authority	Assesses the longer-term reliability of its Planning Coordinator Area.
<input type="checkbox"/>	Resource Planner	Develops a one-year plan for the resource adequacy of specific loads within a Planning Coordinator area
<input type="checkbox"/>	Transmission Planner	Develops a one-year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area.
<input type="checkbox"/>	Transmission Service Provider	Administers the transmission tariff and provides the transmission services under applicable transmission service agreements (e.g., the pro forma tariff).
<input type="checkbox"/>	Transmission Owner	Owens and maintains transmission facilities
<input type="checkbox"/>	Transmission Operator	Operates and maintains the transmission facilities, and executes switching orders.
<input type="checkbox"/>	Distribution Provider	Delivers electrical energy to the end-use customer.
<input type="checkbox"/>	Generator Owner	Owens and maintains generation facilities.
<input type="checkbox"/>	Generator Operator	Operates generation units(s) to provide real and reactive power.

FRCC Regional Reliability Standard Request Form (cont.)

NERC Reliability Principles

<i>Applicable Reliability Principles (Check box for all that apply.)</i>	
<input type="checkbox"/>	1. Interconnected Bulk Electric Systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected Bulk Electric Systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected Bulk Electric Systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected Bulk Electric Systems shall be developed, coordinated, maintained, and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected Bulk Electric Systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk electric systems shall be assessed, monitored, and maintained on a wide-area basis.

FRCC Regional Reliability Standard Request Form (cont.)

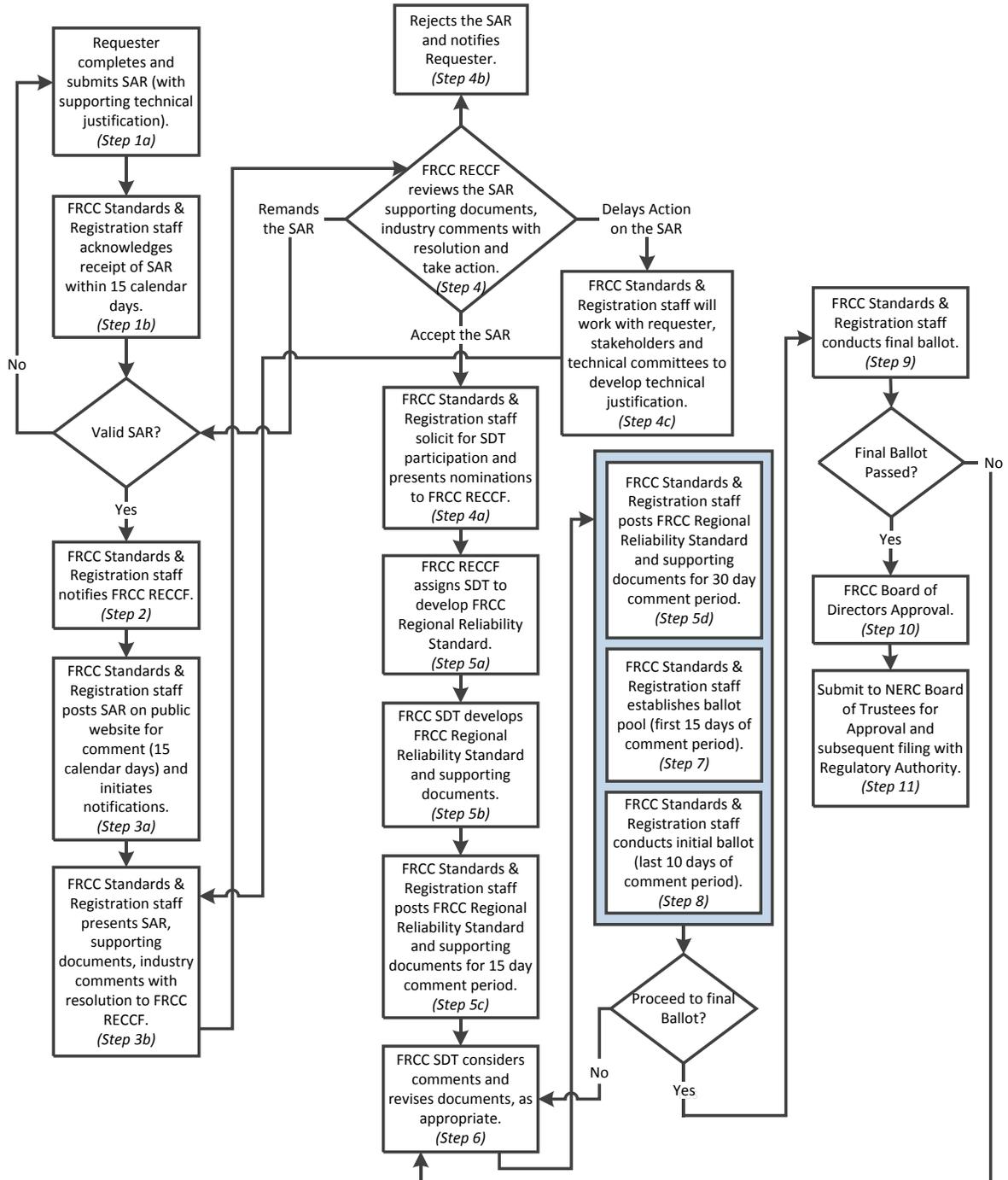
NERC Market Interface Principles

Does the proposed Standard comply with all of the following Market Interface Principles?	
yes or no <input type="checkbox"/> <input type="checkbox"/>	1. A Reliability Standard shall not give any market participant an unfair competitive advantage.
yes or no <input type="checkbox"/> <input type="checkbox"/>	2. A Reliability Standard shall neither mandate nor prohibit any specific market structure.
yes or no <input type="checkbox"/> <input type="checkbox"/>	3. A Reliability Standard shall not preclude market solutions to achieving compliance with that standard.
yes or no <input type="checkbox"/> <input type="checkbox"/>	4. A Reliability Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with Reliability Standards.

Related Standards

Standard No.	Explanation

Attachment B
FRCC Regional Reliability Standard Development Process Flowchart



Attachment C



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Development of and Voting of the Registered Ballot Body

1. Registration Procedures

The Registered Ballot Body comprises all entities² and persons that:

- Qualify for one of the FRCC Industry Sectors, and
- Are registered with the FRCC as potential ballot participants in the voting on FRCC Regional Reliability Standards.

All registrations will be done electronically. All entities and persons will self-select to belong to the Registered Ballot Body. The sectors shall be identical to those in Section 1.2 of the *FRCC Bylaws*.

All Registered Ballot Body members will have the ability to vote on a standard. Voting will be done in writing (either email or facsimile) with each Registered Ballot Body member having one vote. The Registered Ballot Body representative will have the right to register and participate in ballot pools to cast their vote on a standard being considered for approval.

2. Sector Qualification Guidelines

The general guidelines are as follows:

- An entity or person may register in the Registered Ballot Body in any Sector in which it qualifies for provided that an entity or person registers as a potential ballot participant in only one (1) Sector.
- Any individual currently employed by an organization that is eligible to join one or more of the other five (5) sectors, shall not be qualified to join as a General Sector Registered Ballot Body member.

² An entity and all of its Affiliates (as defined in the FRCC Bylaws) shall be considered one entity for purposes of registering as a potential ballot participant.

3. Ballot Pool Voting

A Ballot Pool will be established to vote on any proposed standards action. Each Registered Ballot Body member choosing to belong to a Ballot Pool will have one individual vote. Two-thirds of the individual votes³ of the Ballot Pool shall constitute a quorum.

Approval of a FRCC Regional Reliability Standard requires the affirmative vote of a two-thirds majority of the weighted sector votes cast.

The following steps will be used to determine if there are sufficient affirmative votes:

- 3.1. The number of affirmative votes cast in each sector will be divided by the sum of affirmative and negative votes cast to determine the fractional affirmative vote for each sector. Negative votes without comments and abstentions will not be counted.
- 3.2. The fractional affirmative vote for a sector will then be multiplied by the Sector Weight Factor to determine the weighted fractional affirmative vote for a sector.

The Sector Weight Factors are:

- Suppliers Sector: Weight Factor = 2.5
- Non-Investor Owned Utility Wholesale Sector: Weight Factor = 2.0
- Load Serving Entity Sector: Weight Factor = 1.0
- Generating Load Serving Entity Sector: Weight Factor = 3.0
- Investor Owned Utility Sector: Weight Factor = 3.5
- General Sector: Weight Factor = 1.0

- 3.3. The sum of the weighted fractional affirmative votes from all sectors divided by the sum of the weights of the sectors voting will be used to determine if a two-thirds majority has been achieved. A sector will be considered as “voting” if any member of the sector in the Ballot Pool casts either an affirmative or negative vote.
- 3.4. A FRCC Regional Reliability Standard will be considered “approved” if the sum of the weighted fractional affirmative votes from all sectors divided by the sum of the weights of the voting sectors is two-thirds or greater.
- 3.5. Each member of the Ballot Pool may vote one of the following positions:

- Affirmative
- Affirmative, with comment
- Negative without comment

³ Quorum is determined based on the individual votes cast (affirmative, negative, negative without comments and abstentions)

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Negative with comments (if possible reasons should include specific wording or actions that would resolve the objection)

Abstain

- 3.6.** Each Ballot Pool member submitting a negative vote with comments shall determine if the response provided by the drafting team satisfies those stated concerns. Each such balloter shall be informed of the appeals process contained within this manual.
- 3.7.** If a standard achieves a quorum and there are no negative votes with comments from the initial ballot, and the overall approval is at least two thirds (weighted by segment) then the results of the Initial Ballot shall stand as final and the draft Reliability Standard and associated implementation plan shall be deemed to be approved by its Ballot Pool.

ATTACHMENT 2:

Amended Florida Reliability Coordinating Council Regional Reliability Standard Development
Process Manual – Redline



FRCC REGIONAL RELIABILITY STANDARD DEVELOPMENT PROCESS MANUAL

FRCC-RE-STD-001

Effective Date: Month Day, Year

Version: 1

3000 Bayport Drive, ~~Amended~~ *September 25, 2007*



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~~Regional Reliability~~ www.frcc.com

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Document Subject Matter Expert: Manager of Standards Principles and Registration

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Original Author: Peter Heidrich

Effective Date: MM/DD/YY

Responsible Department: Standards Development Process Roles and Registration

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Last Date Reviewed: 06/19/15

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1.0 Purpose

This manual establishes the process for development, revision, withdrawal and approval of [FRCC Florida Reliability Coordinating Council, Inc. \(FRCC\)](#) Regional Reliability Standards for the FRCC Region. - FRCC Regional Reliability Standards apply to the reliability planning and reliable operation of the Bulk Power System in the FRCC Region. Proposed FRCC Regional Reliability Standards shall be subject to approval by the North American Electric Reliability Corporation (NERC), as the ~~electric reliability organization~~, [Electric Reliability Organization \(ERO\)](#) and by the Federal Energy Regulatory Commission (FERC) before becoming mandatory and enforceable under Section 215 of the Federal Power Act. FRCC Regional Reliability Standards, when approved by FERC, shall be made part of the body of [the NERC reliability standards](#) [Reliability Standards](#) and shall be enforced upon all applicable bulk power system owners, operators and users within the FRCC Region, regardless of membership in the region.

The FRCC Regional Reliability Standards Development Process is based on providing an open and fair process that ensures all interested and affected parties have an opportunity to participate in the development of FRCC Regional Reliability Standards. Any entity (person, organization, company, government agency, individual, etc.) with a direct and material interest in the reliability of the FRCC Bulk Power System has a right to participate by: a) expressing a position and its basis, b) having that position considered, c) voting on and d) having the right to appeal.

2.0 Background

[FRCC is responsible for promoting and assuring the reliability of the interconnected Bulk Power System in Peninsular Florida. FRCC carries out its mission through the development of regional standards and compliance assessment and enforcement of continent-wide and regional standards, coordination of system planning, design and operations, and assessment of reliability.](#)

[The Energy Policy Act \(EPA\) of 2005 \(Section 1211\) amended the Federal Power Act \(FPA\) by adding Section 215, Electric Reliability. Specifically regarding standards development and pursuant with Section 215\(e\) \(4\) of the FPA, FRCC as a Regional Entity with delegated authority from NERC may propose regional standards to NERC for eventual enforcement within the FRCC region.](#)

[NERC Reliability Standards are comprised of both continent-wide and regional standards. The FRCC regional standards apply only to that part of the Eastern Interconnection within the FRCC geographical area.](#)

3.0 FRCC Regional Reliability Standards Development Process

1.4.3.1 FRCC Regional Reliability Standard Principles

FRCC Regional Reliability Standards go beyond, add detail to, or implement [the NERC Reliability Standards](#), or cover matters not addressed in [the NERC Reliability Standards](#). FRCC Regional Reliability Standards shall not be inconsistent with or less stringent than [the NERC Reliability Standards](#).

FRCC Regional Reliability Standards are based on [the NERC's Reliability Principles](#) and [Market Interface Principles](#). Each FRCC Regional Reliability Standard shall enable or support one or more of [NERC's Reliability Principles](#) and must accommodate competitive electricity markets by being consistent with [NERC's NERC's Market Interface Principles](#).

The FRCC Regional Reliability Standard Development Process defines the fair and open process for development, revision, withdrawal and approval of FRCC Regional Reliability Standards for the FRCC Region and has the following characteristics:

- ~~[Due Open Participation](#)~~ – Participation in the FRCC Regional Reliability Standards [Development Process](#) ~~—Any interested party, or any entity is open to all entities that is~~are directly and materially affected by [FRCC Reliability Standards](#) or the reliability of the FRCC Bulk Power System ~~has a right to participate in this process as indicated in this manual.~~

~~[Openness](#)~~ — Participation ~~is open to any interested party or any entity that is directly.~~ There shall be ~~no financial barriers to participation~~ and ~~materially affected by the reliability of the FRCC Bulk Power System.~~ ~~Participation participation~~ shall not be conditional upon membership in ~~the FRCC.~~ ~~any organization, nor unreasonably restricted on the basis of~~ [technical qualifications or other such requirements](#). All FRCC Regional Reliability Standard ~~development~~ [Development](#) meetings will be ~~open and~~ [publically](#) noticed on the FRCC website.

Balance – The FRCC Regional Reliability Standard Development Process shall have a balance of interests and shall not be dominated by any two interest categories, [individuals, or organizations](#) and no single interest category, [individual, or organization](#) shall be able to defeat a matter.

II. FRCC Regional Reliability Standard Definition, Characteristics, and Elements

Voting – FRCC shall use a voting formula that allocates each industry sector an equal weight [in determining the final outcome of any standard action](#). The FRCC Regional Reliability Standards Development Process shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories. The Registered Ballot Body serves as the consensus body voting to approve each new or proposed Regional Reliability Standard, and/or definition.

Notification of standards development - FRCC shall distribute notices to each member of the Registered Ballot Body, and to each stakeholder who indicates a desire to receive such notices, for each action to create, revise, reaffirm, or withdraw a standard. Notices shall be distributed electronically, with links to the relevant information, and notices shall be posted on FRCC's Standards web page. All notices shall identify a readily available source for further information.

Transparency – The *FRCC Regional Reliability Standards Development Process* shall be transparent to the public.

Consideration of views and objections - Drafting teams shall give prompt consideration to the written views and objections of all participants, providing individualized written responses to those commenting during formal comment periods and those commenting as part of the balloting process. Drafting teams shall make an effort to resolve each objection that is related to the topic under review.

Consensus building - The process shall build and document consensus for each standard, both with regard to the need and justification for the standard and the content of the standard.

Consensus vote - FRCC shall use its voting process to determine if there is sufficient consensus to approve a proposed Reliability Standard, or definition. FRCC shall form a Ballot Pool for each standard action from interested members of its Registered Ballot Body. Approval of any standard action requires:

- A quorum, which is established by at least two thirds of the members of the Ballot Pool submitting a response with an affirmative vote, a negative vote, or an abstention; and
- A two-thirds majority of the weighted segment votes cast shall be affirmative. The number of votes cast is the sum of affirmative and negative votes, excluding abstentions and non-responses.

Timeliness – Development of standards shall be timely and responsive to new and changing priorities for reliability of the FRCC Bulk Power System.

3.2 FRCC Regional Reliability Standard Elements

4.1.13.2.1 Definition

A FRCC Regional Reliability Standard defines certain obligations or requirements of all owners, operators and users of the FRCC Bulk Power System regardless of membership in the FRCC. The obligations or requirements must be material to reliability and measurable. ~~Each obligation and requirement shall support one or more of the NERC reliability principles and shall be consistent with all of the NERC reliability and market interface principles.~~ A Reliability Standard is defined in the NERC Glossary of Terms used in NERC Reliability Standards (effective July 1, 2016) as:

A requirement, approved by the United States Federal Energy Regulatory Commission under Section 215 of the Federal Power Act, or approved or recognized by an applicable governmental authority in other jurisdictions, to provide for Reliable Operation of the Bulk-Power System. The term includes requirements for the operation of existing Bulk-Power System facilities, including cybersecurity protection, and the design of planned additions or

modifications to such facilities to the extent necessary to provide for Reliable Operation of the Bulk-Power System, but the term does not include any requirement to enlarge such facilities or to construct new transmission capacity or generation capacity.

FRCC Regional Reliability Standards go beyond, add detail to, or implement ~~the NERC reliability standards~~ Reliability Standards, or cover matters not addressed in ~~the NERC reliability standards~~ Reliability Standards. FRCC Regional Reliability Standards shall not be inconsistent with or less stringent than NERC ~~reliability standards~~ Reliability Standards.

3.2.2 Reliability Principles

FRCC Regional Reliability Standards are based on the NERC Reliability Principles that define the foundation of reliability for North American Bulk Power Systems. Each FRCC Regional Reliability Standard shall enable or support one or more of the NERC Reliability Principles, thereby ensuring that each standard serves a purpose in support of reliability of the FRCC Bulk Power System. Each FRCC Regional Reliability Standard shall also be consistent with all of the NERC Reliability Principles, thereby ensuring that no standard undermines reliability through an unintended consequence.

3.2.3 Market Principles

Recognizing that Bulk Power System reliability and electricity markets are inseparable and mutually interdependent, all FRCC Regional Reliability Standards shall be consistent with the NERC Market Interface Principles. Consideration of the Market Interface Principles is intended to ensure that FRCC Regional Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

1.1.23.2.4 Characteristics

A FRCC Regional Reliability Standard shall have the following characteristics:

Material to Reliability - A FRCC Regional Reliability Standard shall be material to the reliability of the FRCC Bulk Power System. If the reliability of the FRCC Bulk Power System could be compromised without a particular standard or by a failure to comply with that standard, then the standard is material to reliability.

Measurable - A FRCC Regional Reliability Standard shall establish technical or performance requirements that can be practically measured.

Relative to NERC Reliability Standards - A FRCC Regional Reliability Standard must go beyond, add detail to, or implement NERC ~~reliability standards~~ Reliability Standards, or cover matters not addressed in NERC ~~reliability standards~~ Reliability Standards.

3.2.5 Types of Reliability Requirements

Although FRCC Regional Reliability Standards have a common format and process, several types of Reliability Standards requirements may exist, each with a different approach to measurement:

- ~~Technical standards related to the provision, maintenance, operation, or state of Bulk Power System will likely contain measures of physical parameters and will often be technical in nature.~~

- ~~Performance standards related to the Performance-based requirements define a specific reliability objective or outcome that has a direct, observable effect on the reliability of the Bulk Power System, i.e. an effect that can be measured using power system data or trends.~~

Risk-based requirements define actions of entities providing for or impacting that reduce a stated risk to the reliability of the FRCC Bulk Power System will likely contain measures and can be measured by evaluating a particular product or outcome resulting from the required actions.

Capability-based requirements define capabilities needed to perform reliability functions and can be measured by demonstrating that the capability exists as required.

The body of FRCC reliability requirements, combined with the NERC reliability requirements, collectively provides a defense-in-depth strategy supporting reliability of the results of such actions, or the nature of the performance of such actions FRCC Bulk Power System.

- ~~Preparedness standards related to the actions of entities to be prepared for conditions that are unlikely to occur but are critical to reliability will likely contain measures of such preparations or the state of preparedness.~~

1.1.33.2.6 Elements of a Reliability Standard

A FRCC Regional Reliability Standard ~~shall consist of the~~ includes many elements designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the FRCC Bulk Power System. Elements that are considered mandatory and enforceable are identified in this section of this manual. These below. The elements are intended to apply a systematic discipline in the development and revision of a Reliability Standard include the following:

20Classification: Public

Title: A brief, descriptive phrase identifying the topic of Reliability Standards. The format allows the standard.

Number: A unique identification number assigned in accordance with a published classification system to facilitate tracking and reference to the standards.

Purpose: The reliability outcome achieved through compliance with the requirements of the standard.

Applicability (mandatory and enforceable): Provides clear identification of the functional classes of entities responsible for complying with the standard, noting any specific additions or exceptions.

If not applicable to the entire FRCC, then a clear identification of the portion of the FRCC Bulk Power System to which the standard applies will be made. Any limitation on the applicability of the standard based on electric facility requirements should be described.

Effective Dates (mandatory and enforceable): Identification of when each requirement becomes effective within the jurisdiction of the FRCC.

Requirement (mandatory and enforceable): An explicit statement of the purpose, requirements, measures, and compliance elements that identifies the functional entity responsible, the action or outcome that must be achieved, any conditions achieving the action or outcome, and the reliability-related benefit of the action or outcome. Each requirement shall be a statement for which compliance is mandatory.

Measure: Provides identification of the evidence or types of evidence that may demonstrate compliance with the associated with each Reliability Standard. Supporting documents to aid in requirement. Each requirement shall have at least one measure. Each measure shall clearly refer to the requirement(s) to which it applies.

Evidence Retention: Identification, for each requirement in the standard, of the entity that is responsible for retaining evidence to demonstrate compliance, and the duration for retention of that evidence.

Application Guidelines: Guidelines to support the implementation of a Reliability Standard may be referenced by the the associated standard.

Procedures: Procedures to support implementation of the associated standard.

Time Horizon: The time period related to when a requirement takes place or how much time there may be to mitigate a violation of the associated requirement.

Compliance Enforcement Authority: The entity that is responsible for assessing performance or outcomes to determine if an entity is compliant with the associated standard.

Additional Compliance Information: Any other information related to assessing compliance such as the criteria or periodicity for filing specific reports.

Violation Risk Factors and Violation Severity Levels: Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) are used as factors when determining the size of a penalty or sanction associated with the violation of a requirement in an approved FRCC Regional Reliability Standard. Each requirement in each Reliability Standard ~~but are not part of the~~ has an associated VRF and a set of VSLs. VRFs and VSLs are developed by the drafting team, working with FRCC Standards and Registration staff, at the same time as the associated Reliability Standard ~~itself,~~ but are not part of Reliability Standard. The FRCC Board of Directors is responsible for approving VRFs and VSLs.

Performance Elements of a FRCC Regional Reliability Standard

Identification Number	A unique identification number assigned in accordance with an administrative classification system to facilitate tracking and reference.
Title	A brief, descriptive phrase identifying the topic of the Reliability Standard.
Applicability	Clear identification of the functional classes of entities responsible for complying with the standard, noting any specific additions or exceptions. If not applicable to the entire FRCC, then a clear identification of the portion of the bulk power system to which the standard applies. Any limitation on the applicability of the standard based on electric facility requirements should be described.
Effective Date and Status	The effective date of the Reliability Standard or, the proposed effective date.
Purpose	The purpose of the Reliability Standard. The purpose shall explicitly state what outcome will be achieved or is expected by this Reliability Standard.
Requirement(s)	Explicitly stated technical, performance, and preparedness requirements. Each requirement identifies what entity is responsible and what action is to be performed or what outcome is to be achieved. Each statement in the requirements section shall be a statement for which compliance is mandatory. Any additional comments or statements for which compliance is not mandatory, such as

	background or explanatory information should be placed in a separate document and referenced.
Risk Factor(s)	<p>The potential reliability significance of each requirement, designated as a High, Medium or Lower Risk Factor in accordance with the criteria listed below:</p> <p>A Lower Risk Factor requirement is administrative in nature and (a) is a requirement that, if violated, would not be expected to affect the electrical state or capability of the FRCC Bulk Power System, or the ability to effectively monitor and control the FRCC Bulk Power System; or (b) is a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to affect the electrical state or capability of the FRCC Bulk Power System, or the ability to effectively monitor, control, or restore the FRCC Bulk Power System.</p> <p>A Medium Risk Factor requirement (a) is one that, if violated, could directly affect the electrical state or the capability of the FRCC Bulk Power System but is unlikely to lead to FRCC Bulk Power System instability, separation, or cascading failures; or (b) is a requirement in the planning time frame that, if violated, could under emergency, abnormal, or restorative conditions anticipated by the preparations, directly affect the electrical state or capability of the FRCC Bulk Power System, or the ability to effectively monitor and control the FRCC Bulk Power System but is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to FRCC Bulk Power System instability, separation, or cascading failures, nor to hinder restoration to a normal condition.</p> <p>A High Risk Factor requirement (a) is one that, if violated, could directly cause or contribute to FRCC Bulk Power System instability, separation, or a cascading sequence of failures, or could place the FRCC Bulk Power System at an unacceptable risk of instability, separation, or cascading failures, or (b) is a requirement in a planning time frame that, if violated, could under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to FRCC Bulk Power System instability, separation, or a cascading sequence of failures, or could place the FRCC Bulk Power System at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.</p>

Measure(s)	Each requirement shall be addressed by one or more measures. Measures that will be used to assess performance and outcomes for the purpose of determining compliance with the requirements stated above. Each measure identifies to whom the measure applies and the expected level of performance or outcomes required to demonstrate compliance. Each measure shall be tangible, practical, and as objective as is practical. Achieving the measure should be a necessary and sufficient indicator that the requirement was met. Each measure shall clearly refer to the requirement(s) to which it applies.
Compliance Monitoring Process	<p>The compliance elements define:</p> <ul style="list-style-type: none"> • The specific data or information that is required to measure performance or outcomes. • The entity that is responsible to provide the data or information for measuring performance or outcomes. • The process that will be used to evaluate data or information for the purpose of assessing performance or outcomes. • The entity that is responsible for evaluating data or information to assess performance or outcomes. • The time period in which performance or outcomes is measured, evaluated, and then reset. • Measurement data retention requirements and assignment of responsibility for data archiving.
Violation Severity Levels	Defines the degree to which compliance with a requirement was not achieved. The violation severity levels, are part of the standard and are approved with the standard.

III. Roles in the FRCC Regional Reliability Standard Development Process

Violation Risk Factors (VRFs): VRFs identify the potential reliability significance of noncompliance with each requirement. Each requirement is assigned a VRF in accordance with the latest approved set of VRF criteria.

Violation Severity Levels (VSLs): VSLs define the degree to which compliance with a requirement was not achieved. Each requirement shall have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple “degrees” of noncompliant performance and may have only one, two, or three VSLs. Each requirement is assigned one or more VSLs in accordance with the latest approved set of VSL criteria.

1.1.43.2.7 Nomination, Modification, or Withdrawal of Aa Regional Standard

Any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, shall be allowed to request that a FRCC Regional Reliability Standard be developed, modified, or withdrawn. Additionally, any interested party or any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System shall be allowed to request that a FRCC Regional Reliability Standard be developed, modified, or withdrawn.

A FRCC Standard Authorization Request (SAR) is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified standards or the benefit of retiring one or more approved standards. Any entity or individual may propose the development of a new or modified standard, or may propose the retirement of a standard, by submitting a completed SAR to the FRCC Standards and Registration staff at FRCCStandard@frcc.com.

Each SAR that proposes a “new” standard, should be accompanied with a technical justification that includes, as a minimum, a discussion of the reliability-related impact of not developing the new standard, and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.

1.23.3 Responsibilities and Roles in the FRCC Regional Reliability Standard Development Process ~~Roles~~

3.3.1 FRCC Board of Directors –

The FRCC Board of Directors (BOD) shall consider for adoption ~~as~~ FRCC Regional Reliability ~~Standards, those~~ Standards, definitions, and associated implementation plans that have been developed and approved by the processes identified in this process manual. In addition, the board shall consider for approval, VRFs and VSLs associated with each approved standard. Once the Board adopts a FRCC Regional Reliability Standard, ~~such Standard shall be submitted to or~~ definition, or once the Board approves VRFs or VSLs, the Board shall direct FRCC Standards and Registration staff to file the document(s) with NERC for approval. ~~When approved by NERC, it will be submitted to FERC for approval with the applicable regulatory authorities.~~

3.3.2 Registered Ballot Body (~~RBB~~)–

The ~~registered ballot body~~ Registered Ballot Body votes to approve FRCC Regional Reliability Standards, definitions, and associated implementation plans. The ~~RBB~~ Registered Ballot Body comprises all entities ~~or persons and individuals~~ that qualify for one of the FRCC Industry Sectors as defined in Section 1.2 of the FRCC Bylaws, and are registered with FRCC as potential ballot participants in the voting on standards. FRCC membership is not a requirement to participate in the development of, and voting on, FRCC Regional Reliability

Standards. Any entity or ~~person~~individual that has a material interest in the reliability of the FRCC Bulk Power System shall be allowed to register as potential ballot participants in the ~~RBB~~. (See ~~Appendix C~~)Registered Ballot Body. (See Attachment C) Each member of the Registered Ballot Body is eligible to join the Ballot Pool for each standard action.

3.3.3 Ballot Pool (BP)

Each standard action has its own ~~BP~~Ballot Pool formed of interested members of the ~~RBB~~.Registered Ballot Body. The ~~BP~~Ballot Pool comprises those members of the ~~RBB~~Registered Ballot Body that respond to a pre-ballot survey participation request for that particular standard ~~that indicates their desire to participate in the ballot of that standard.~~action. The ~~BP~~Ballot Pool will vote to approve each standard action. The Ballot Pool remains in place until all balloting related to that standard action is complete.

~~FRCC Regional Reliability Standard.~~

3.3.4 FRCC Operating Entity Committee (OC) and FRCC Planning Committee (PC)—~~The FRCC OC and the FRCC PC (both of which are~~ Compliance Forum (RECCF)

~~The FRCC RECCF, a balanced stakeholder committees, see Appendix C) shall have the primary responsibility committee, is responsible for managing the standards processes for the development, modification or withdrawal of FRCC of standards, VRFs, VSLs, and definitions in accordance with this manual. The responsibilities of the FRCC RECCF are defined in detail in the committee scope document.~~

Per Section 3.4 of this manual, the FRCC RECCF has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the work of a drafting team. The FRCC RECCF may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for the NERC's *Benchmarks for Reliability Standards*, or to meet the criteria for governmental approval, however the FRCC RECCF shall not direct a drafting team to change the technical content of a draft standard. The FRCC RECCF shall meet at regularly scheduled intervals (either in person, or by other means). FRCC RECCF meetings where topics related to the Standards Development Process are being discussed or acted on will be publically posted on the FRCC website.

3.3.5 FRCC Standards and Registration Staff

The FRCC Standards and Registration staff, led by the Manager of Standards and Registration, is responsible for administering FRCC's Reliability Standards Processes in accordance with this manual and adhering to the requirements identified in the *NERC Regional Reliability Standards—Evaluation Procedure*. The FRCC Standards and Registration staff provides support to the FRCC RECCF in managing the standards processes and supporting the work of all drafting teams. The FRCC Standards and Registration staff work to ensure the integrity of the standards processes and consistency of quality and completeness of the Reliability Standards. The FRCC Standards and Registration staff facilitates all steps in the development of standards, definitions, and associated

implementation plans. The FRCC Standards and Registration staff work with drafting teams in developing VRFs and VSLs for each standard.

The FRCC Standards and Registration staff shall coordinate a quality review of the “final draft” of the Reliability Standard, its implementation plan, and VRFs and VSLs to assess whether the documents are within the scope of the associated SAR, whether the standard is clear and enforceable as written, and whether the standard meets the criteria specified in the NERC and FERC guidelines. This review shall normally be completed within thirty (30) calendar days¹ of receipt of the final version of the documents from the Standard Drafting Team (SDT). The detailed results of this review shall be provided to the SDT for consideration. The SDT shall consider the results of the quality review, decide upon appropriate changes, and recommend to the FRCC RECCF whether the documents are ready for formal posting and balloting.

If the FRCC RECCF agrees that the proposed Reliability Standard, implementation plan, and VRFs and VSLs pass this review, the FRCC RECCF shall authorize posting for a formal comment period, ballot (for the standard and implementation plan), and non-binding poll (for VRFs and VSLs) as soon as the work flow will accommodate.

If the FRCC RECCF finds that any of the documents do not meet the specified criteria, the FRCC RECCF shall remand the documents to the SDT for additional work.

~~If FRCC Standards Process Manager—The FRCC Regional Reliability Standard Development Process shall be administered by the FRCC Standards Process Manager. The FRCC Standards Process Manager will ensure the integrity of the process and the consistency of quality and completeness of the FRCC Regional Reliability Standards. The FRCC Standards Process Manager will facilitate all steps in this process, and will coordinate with NERC to ensure required information is posted on both NERC and FRCC websites.~~

~~Standard Drafting Team—A team of technical experts, such as FRCC the standard is outside the scope of the associated SAR, the SDT shall be directed to either revise the standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the standard is not clear and enforceable as written, or if the standard or its VRFs and/or VSLs do not meet the specified criteria, the standard shall be returned to the SDT with specific identification of any requirement that is deemed to be unclear or unenforceable as written.~~

The FRCC Standards and Registration staff is responsible for presenting standards, and definitions to the FRCC Board of Directors for adoption. When presenting standards-related documents to the FRCC Board of Directors for adoption or approval, the FRCC standards

¹ Time periods specified in this manual may be extended as deemed appropriate by FRCC Staff. When business days are specified, this provision could be used to take into account different US holiday schedules. When calendar days are specified, this provision could be used to take into account due dates that fall on a weekend.

and Registration staff shall report the results of the associated stakeholder ballot, including identification of any unresolved minority stakeholder issues.

3.3.6 Drafting Teams

The FRCC RECCF shall appoint industry subject matter experts to drafting teams to work with stakeholders in developing and refining SARs, standards, VRFs, VSLs and definitions.

Each drafting team consists of a group of technical experts that work cooperatively with the support of the FRCC Standards and Registration staff. The technical experts provide subject matter expertise and guide the development of the technical aspects of the standard. The technical experts maintain authority over the technical details of the standard. Each drafting team appointed to develop a standard is responsible for following the processes identified in this manual from the inception of the assigned project through the final acceptance of that project by applicable governmental authorities.

Collectively, each drafting team will:

- Draft proposed language for the Reliability Standards, definitions, and associated implementation plans.
- Solicit, consider, and respond to comments related to the specific standards development project.
- Participate in industry forums to help build consensus on the draft Reliability Standards, definitions, and associated implementation plans.
- Assist in developing the documentation used to obtain approval and subsequent filing of the Reliability Standards, definitions and associated implementation plans.

The FRCC Standards and Registration staff shall provide a member to support the team with technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. The individuals provided by the FRCC Standards and Registration staff serve as advisors to the drafting team and do not have voting rights. The FRCC RECCF may also supplement the membership of a standard drafting team at any time to ensure the necessary competencies and diversity of views are maintained throughout the standard development effort. All drafting teams report to the FRCC RECCF.

3.3.7 Governmental Authorities

The Federal Energy Regulatory Commission (FERC) in the United States of America has the authority to approve each new, revised or withdrawn Reliability Standard, definition, VRF, and VSL following adoption or approval by the NERC Board of Trustees.

1.2.13.3.8 FRCC Committees, Subcommittees, Working Groups, Task Forces, or the FRCC Staff, will be appointed by the FRCC OC and/or PC, that will: and Task Forces

- Develop the details of the FRCC Regional Reliability Standard,

20Classification: Public

- ~~Consider and respond to industry comments,~~
- ~~Participate in forums to help build consensus on draft FRCC Regional Reliability Standards,~~
- ~~Assist in the implementation of approved FRCC Regional Reliability Standards,~~
- ~~Provide technical oversight in response to changing industry conditions,~~
- ~~Assist in the identification of the need for new FRCC Regional Reliability Standards.~~

FRCC's technical committees, subcommittees, working groups, and task forces may provide technical research and analysis used to justify the development of new standards and may provide guidance, when requested by the FRCC RECCF, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees, working groups, and task forces may provide feedback to drafting teams during both informal and formal comment periods.

The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified standards or requirements with the FRCC Standards and Registration staff for use in identifying the need for new standards projects.

3.3.9 **FRCC Compliance Staff –**

The FRCC ~~compliance~~Compliance staff ~~provides~~provide input and comments during the standard development process to ensure the requirements are not ambiguous, that measures ~~will be~~are clear and effective and that the compliance elements of a standard can be practically implemented.

IV. Steps in Developing a FRCC Regional Reliability Standard

3.4 Process for Developing an FRCC Regional Reliability Standard

1.2.23.4.1 Step 1 – Request a new FRCC Regional Reliability Standard or modification to, or withdrawal of an existing FRCC Regional Reliability Standard

~~A request~~**Step 1a - A Standard Authorization Request (SAR)** to develop, modify or withdraw a FRCC Regional Reliability Standard shall be submitted to the FRCC Standards ~~Process Manager~~ and Registration staff (via email to ~~FRCCStandard@free.com~~)**FRCCStandard@frcc.com**) by any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, or any interested party or any entity that is directly and materially affected by reliability of the FRCC Bulk Power System. ~~The FRCC Standards Process Manager will acknowledge receipt of the request within fifteen (15) calendar days of its receipt.~~

Step 1b - The FRCC Standards and Registration staff shall acknowledge receipt of the request within fifteen (15) calendar days of its receipt.

1.2.33.4.2 Step 2 – ~~Assignment of~~ FRCC Regional Reliability Standard Request

The FRCC Standards ~~Process Manager will assign~~ and Registration staff shall notify the **FRCC RECCF** of the request to the **FRCC OC**, the **FRCC PC**, or both as appropriate.

1.2.43.4.3 Step 3 – Posting of FRCC Regional Reliability Standard Request

~~The request for standard development, modification or withdrawal~~**Step 3a - The SAR** will be posted for notification and comment on the FRCC public website for a period of fifteen (15) calendar days, ~~and will be reviewed by the FRCC OC and/or PC. A notice of the posting for comment will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek input on the proposed request.~~

- For SARs that address the development of a new standard, the SAR will be posted for a fifteen (15) calendar day formal comment period.
- For SARs that are limited to modifications to or withdrawal of existing standards, the SAR will be posted for a fifteen (15) calendar day informal comment period.

The intent of the formal comment periods is to solicit very specific feedback on the SAR and technical justification. A written response to each comment received is required.

Feedback gathered from the informal comment period shall be publicly posted and, while a written response to each individual comment received is not required, a summary response that identifies how the comments were considered is required.

A notice of the posting for comment shall be sent to (1) the Registered Ballot Body Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.

Step 3b - Following the comment period, the FRCC Standards and Registration staff shall present the SAR, supporting documents, industry comments with resolution to the FRCC RECCF for review.

1.2.53.4.4 Step 4 – Acceptance of a FRCC Regional Reliability Standard Request

The FRCC OC and/or the PC will review the request and any comments submitted to determine if the request received will be accepted or rejected within sixty (60) days of its submission. **Step 4** - The FRCC RECCF reviews the SAR, supporting documents, industry comments and resolutions and takes one of the following actions:

- Accept the SAR.
- Remand the SAR back to the requester and FRCC Standards and Registration staff for additional work. The FRCC RECCF will provide a written explanation for the remand.
- Reject the SAR. If the FRCC RECCF rejects a SAR, a written explanation for rejection will be provided to the requester within ten (10) calendar days of the rejection decision.
- Delay action on the SAR pending development of a technical justification for the proposed project.

The review decision will be publically posted.

~~Step~~ ~~and, if~~ **4a** - If accepted, the ~~OC and/or the PC~~ FRCC RECCF will assign and direct a Standard Drafting Team seek industry volunteers, establish the SDT to further develop the SAR (if necessary), draft the Regional Reliability Standard and to address comments submitted during the posting periods. The FRCC Standards and Registration staff will publicly post a request for fifteen (15) calendar days soliciting industry volunteers to participate on the SDT.

Step 4a.1 - FRCC Standards and Registration staff will present a list of qualified candidates to the FRCC RECCF for potential assignment to the SDT.

~~Step~~ ~~-4b~~ - If the request is rejected, the FRCC Standards ~~Process Manager~~ and Registration staff will send notification to the entity making the request.

~~Step~~ ~~and to all entities that received the notice~~ **4c** - If the FRCC RECCF is presented with a SAR that proposes developing a new standard but does not have a technical justification upon

which the standard can be developed, the FRCC RECCF shall delay action and direct the FRCC Standards and Registration staff to post the SAR for a thirty (30) calendar day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the FRCC RECCF shall solicit assistance from FRCC's technical committees or other industry experts in Step 3 above providing that foundation before authorizing development of the associated standard.

1.2.63.4.5 Step 5 – Drafting and Posting of a FRCC Regional Reliability Standard

Step 5a - The FRCC OC and/or PC RECCF will assign a Standard Drafting Team SDT, within sixty (60) calendar days of acceptance of the request, to develop, in a timely manner, a draft FRCC Regional Reliability Standard that will address the accepted request. The FRCC OC and/or PC may provide a timeframe that is desired for completion of the standard development.

Under the direction of Step 5b - The SDT shall develop a project schedule and report progress, to the FRCC OC and/or PC, the Standard Drafting Team, will RECCF, against that schedule as requested by the FRCC RECCF.

The SDT, shall consider all comments received on the posting of the standard request SAR and will shall develop a draft FRCC Regional Reliability Standard and corresponding implementation plan.

The SDT shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual with a goal of meeting the quality attributes identified in NERC's *Ten Benchmarks for Excellent Reliability Standards* and criteria for governmental approval. The team shall document its justification for the requirements in its proposed standard by explaining how each meets these criteria.

As The draft FRCC Regional the SDT drafts a Reliability Standard, that team is also required to develop an implementation plan and any supporting to identify any factors for consideration when approving the proposed effective date or dates for the associated standard or standards. A single implementation plan may be used for more than one standard. As a minimum, the implementation plan shall include the following:

- The proposed effective date (the date entities shall be compliant) for the requirements.
- Identification of any new or modified definitions that are proposed for approval with the associated standard.
- Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the requirements.
- Whether approval of the proposed standard will necessitate any conforming changes to any already approved standards – and identification of those standards and requirements.
- The functional entities that will be required to comply with one or more requirements in the proposed standard.

The SDT shall work with FRCC Standards and Registration staff in developing a set of VRFs and VSLs that meet the latest criteria established by the NERC and governmental authorities. The SDT shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet these criteria. FRCC Standards and Registration staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.

Before the SDT has finalized its standard, implementation plan, VRFs and VSLs, the SDT should seek stakeholder feedback on its preliminary draft documents ~~shall be posted for comments on the FRCC public website for a period.~~

The SDT may use a variety of methods to collect stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods, webinars, industry meetings, workshops, or other mechanisms. Informal comment periods, if used, shall have a minimum duration of fifteen (15) calendar days, ~~or such longer period as determined by the~~. Information gathered from informal comment forms shall be publicly posted and, while ~~drafting team or as directed by the FRCC OC and/or the PC.~~ Notice of the posting will go out to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and teams are not required to provide a written response to each individual comment received, ~~drafting teams must post a summary response that identifies how it used comments submitted by stakeholders.~~ The intent is to gather stakeholder feedback on a “working document” before the document reaches the point where it is considered the “final draft.”

The FRCC Standards and Registration staff shall conduct a quality review of the new or modified standard, its associated VRFs and VSLs, and implementation plan prior to each posting.

~~Step~~ groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek ~~5c~~ - The initial formal comment period, and if necessary subsequent formal comment periods, shall be for at least thirty (30) calendar day duration and shall start after the SDT has posted its consideration of stakeholder comments, and any conforming changes to the associated standard.

The intent of the formal comment periods is to solicit very specific feedback on the final draft of the standard, VRFs, VSLs, and implementation plan. If stakeholders disagree with some aspect of the proposed set of products, comments provided should suggest specific language that would make the product acceptable to the stakeholder.

Notice of the posting will go out to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek comments.

Comments shall be submitted (via email) to the FRCC Standards ~~Process Manager (FRCCStandard@free.com).~~ and Registration staff (FRCCStandard@fcc.com). All comments are due by the close of business on the 15th ~~calendar day of posting, or such~~

20Classification: Public

~~later posted due date as determined by the drafting team or as directed by the FRCC OC and/or PC.~~ If the comment due date falls on a weekend or nationally recognized holiday, the comments shall be due by the close of business on the next regularly scheduled business day.

1.2.73.4.6 Step 6 – Standards Drafting Team Review of Comments

~~All comments should be submitted electronically to the~~ The FRCC Standards Process Manager ~~who~~ and Registration staff will forward all comments to the Standard Drafting Team SDT for consideration. All timely comments will be considered.

~~Under the direction given by the FRCC OC and/or the PC, the Standard Drafting Team will~~ The SDT shall review the comments received and revise the draft FRCC Regional Reliability Standard and/or implementation plan as needed. The Standard Drafting Team ~~will~~ SDT shall develop written responses to each comment received.

All responses to the submitted comments will be documented and posted on the FRCC public website. If needed, a second revised draft of the FRCC Regional Reliability Standard ~~will~~ shall be posted for another comment period. ~~Such comment period shall be fifteen (15) calendar days, or such longer period as determined by the drafting team or as directed by the FRCC OC and/or PC.~~

Notice of the posting will go out to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek comments.

~~Notice of the posting will go out to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek comments.~~

Based on comments received to the posting, appropriate portions of Step 65 will be repeated as necessary until the Standards Drafting Team SDT believes the draft FRCC Regional Reliability Standard is ready to submit to the Ballot Pool for approval.

1.2.83.4.7 Step 7 – Establishment of Ballot Pool

The FRCC Standards and Registration staff shall establish a Ballot Pool during the first fifteen (15) calendar days of the first thirty (30) calendar day formal comment period. The FRCC Standards and Registration staff shall post the proposed standard, its implementation plan, VRFs, and VSLs and shall send a notice to every entity in the Registered Ballot Body to provide notice that there is a new or revised standard proposed for approval and to solicit participants for the associated ballot pool. One member from each entity of the Registered Ballot Body is eligible to join each Ballot Pool to vote on a new or revised Reliability Standard and its implementation plan. Members who join the Ballot Pool to vote on the new or revised standard and its implementation plan are automatically entered into the ballot pool to participate in the non-binding poll of the associated VRFs and VSLs.

~~Any member of the The Standard Drafting Team shall submit the final draft of the proposed FRCC Regional Reliability Standard, along with any minority opinions, and all comments and written responses received during the posting(s), to the FRCC Standards Process Manager. The FRCC Standards Process Manager shall establish a Ballot Pool for standard action at least fifteen (15) calendar days prior to the start of a ballot. A pre-ballot survey will be sent to each entity of the RBB to determine their desire to be placed in the Ballot Pool. Once the ballot period opens, the Ballot Pool will be closed and changes to the Ballot Pool participation will not be allowed.~~

~~Registered Ballot Body may join or withdraw from the ballot pool until the ballot window opens. No Registered Ballot Body member may join or withdraw from the ballot pool once the first ballot starts through the point in time where balloting for that standard action has ended. The FRCC Manager of Standards and Registration may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a ballot pool member that would prevent an entity that had a member in the ballot pool from eligibility to cast a vote during the ballot window. Any approved deviation shall be documented and noted to the FRCC RECCF.~~

1.2.93.4.8 Step 8 Initial – Ballot of the new or revised FRCC Regional Reliability Standard and Non-Binding Poll of VRFs and VSLs

~~The FRCC Standards Process Manager will post the final draft of the standard on the FRCC website at least fifteen (15) calendar days before a and Registration staff shall announce the opening of the initial ballot can begin. The Ballot Pool shall have a minimum window and the non-binding poll of VRFs and VSLs. The ballot window and non-binding poll window shall both take place during the last ten (10) calendar days of the thirty (30) calendar day formal comment period. This allows all stakeholders the opportunity to comment on the final draft of each proposed standard, even those stakeholders who are not members of the Ballot Pool.~~

~~The ballot and non-binding poll shall be conducted electronically. The voting and polling windows shall each be a period of ten (10) calendar days to vote on a standard. The Ballot Pool may vote to approve but both shall be extended, if needed, until a quorum is achieved. During a ballot window, FRCC shall not sponsor or not approve the facilitate public discussion of the standard action under ballot.~~

~~The SDT shall consider every stakeholder comment submitted either in response to a formal comment period or submitted with a ballot that includes a proposal for a specific modification to the standard. If approved, the FRCC Standards Process Manager will submit the FRCC Regional Reliability Standard, proposed or its implementation plan, and any supporting documents to the FRCC Board of Directors for adoption posted for comment and approval. The SDT shall be responsive to all comments by providing a written response and indicating whether the drafting team adopted or rejected any recommendations.~~

~~If stakeholders submit comments that indicate a specific improvement to one or more of the VRFs or VSLs and the modification would improve consensus without violating the criteria for setting VRFs and VSLs, then the SDT, working with FRCC Standards and Registration~~

staff, shall consider and respond to each comment, and shall make conforming changes to reflect those comments. There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard; however, if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.

All comments submitted and the responses to those comments shall be publicly posted.

See Attachment C *Development of and Voting of the Registered Ballot Body* for ballot approval and quorum requirements.

If a stakeholder or balloter proposes a significant revision to the standard during the formal comment period or concurrent initial ballot that will improve the quality, clarity, or enforceability of that standard then the SDT shall make such revisions and post the revised standard (that has been significantly changed from the previous ballot) for another public comment period and an additional ballot.

The SDT shall address comments submitted during additional ballot periods (comments submitted from stakeholders during the open formal comment period and comments submitted with negative ballots) in the same manner as for the Initial Ballot. Once the SDT has a draft standard that has been through an “additional ballot” and the team believes that no additional significant modifications are needed, or the SDT has reached a point where it has made a good faith effort at resolving applicable objections, the standard shall be posted for a Final Ballot.

3.4.9 Step 9 - Final Ballot - of the new or revised FRCC Regional Reliability Standard

In the Final Ballot, members of the ballot pool shall again be presented the proposed standard (that has not been significantly changed from the previous ballot) along with the reasons for negative votes, the responses, and any resolution of the differences. An insignificant revision is a revision that does not change the scope, applicability, or intent of any requirement and includes but is not limited to things such as correcting the numbering of a requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a requirement for improved clarity. Where there is a question as to whether a proposed modification is “substantive” the FRCC RECCF shall make the final determination. There is no formal comment period concurrent with the Final Ballot and no obligation for the SDT to respond to any comments submitted during the Final Ballot.

All members of the Ballot Pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the Ballot Pool who did not respond to the prior ballot shall be permitted to vote in the Final Ballot. In the Final Ballot, votes shall be counted by exception only. Members of the ballot pool for the Final Ballot may indicate a revision to their original vote otherwise their vote shall remain the same as in their prior ballot.

There are no limits to the number of “additional” public comment periods and ballots that can be conducted to result in a standard that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The FRCC RECCF has the authority to conclude this

process or a particular standards action if it becomes obvious that the SDT cannot develop a standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted segment approval percentage.

The FRCC Standards and Registration staff shall post the final outcome of the ballot process. If the standard is approved, the consensus standard shall be posted and presented to the Board of Directors for adoption by the FRCC.

Step 10~~If approval by the Ballot Pool is not obtained, the PC and/or OC will determine if the draft standard is to be sent back to the standard drafting team to repeat step 6 to incorporate any comments, or to take no further action.~~

~~If no further action is taken, the reason for such will be posted on the FRCC public website. A notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.~~

1.2.103.4.10 ~~Step 9~~ — Adoption of FRCC Regional Reliability Standards and Implementation Plans by the FRCC Board of Directors

At a regular or special meeting, the FRCC Board of Directors may consider adoption of the proposed FRCC Regional Reliability Standard and the associated implementation plan that ~~has~~have been approved by the ~~RBB~~Registered Ballot Pool. A FRCC Regional Reliability Standard and the associated implementation plan submitted for adoption by the FRCC Board of Directors must be posted for notification and comment on the FRCC public website at least ten (10) calendar days prior to action by the FRCC Board of Directors. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator. The FRCC Board of Directors shall consider the comments received, the responses provided, and any dissenting opinions. The FRCC Board of Directors shall adopt or reject a FRCC Regional Reliability Standard and the associated implementation plan as submitted, but may not modify the proposed FRCC Regional Reliability Standard. If the FRCC Board of Directors chooses not to adopt a FRCC Regional Reliability Standard, it shall provide its reasons for ~~not doing so~~such decision and the decision will be posted on the FRCC public website. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.

~~If the FRCC Board of Directors chooses not to adopt the proposed FRCC Regional~~The board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider ~~the reason for such decision will be posted~~following:

- FRCC Standards and Registration staff shall present the results of the non-binding poll conducted and a summary of industry comments received on the FRCC public website.

Notice of the final posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) of the proposed VRFs and VSLs.

- FRCC Standards and Registration staff shall present a set of recommended VRFs and VSLs that considers the Florida Public Service Commission, and (4) views of the SERC Southern Sub-Region SDT, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Coordinator. Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.

1.2.113.4.11 Step 1011 – Submission to ~~NERC~~the ERONERC and FERC

Once the FRCC Regional Reliability Standard ~~is~~and the associated implementation plan are adopted by the FRCC Board of Directors, the FRCC ~~Standard Process Manager~~Standards and Registration staff shall submit the FRCC Regional Reliability Standard ~~to, the associated implementation plan and all supporting documents to the NERC for approval. Upon approval by the NERC for approval. When approved by NERC, it, all documentation~~ shall be submitted by ~~the~~ NERC to FERC for approval. If ~~the~~ NERC or FERC rejects the FRCC Regional Reliability Standard, the FRCC Board of Directors will determine if the standard is to be sent back to the ~~OC and/or PC~~FRCC RECCF to incorporate their comments or to take no further action on the standard. A FRCC Regional Reliability Standard that is adopted by the FRCC Board of Directors, approved by ~~the~~ NERC and FERC, shall become effective on a date designated by FERC.

1.33.5 ~~V.~~ Special Procedures

1.3.13.5.1 Urgent Action

Under certain conditions, the entity making the request or the FRCC ~~OC and/or the PC~~RECCF may designate a proposed or revised FRCC Regional Reliability Standard as requiring urgent action. Urgent action may be appropriate when a delay in implementing a proposed or revised FRCC Regional Reliability Standard will materially impact reliability of the Bulk Power System in the FRCC Region. The FRCC ~~OC and/or the PC~~RECCF must use its judgment carefully to ensure an urgent action is truly necessary and not simply an expedient way to change or implement a FRCC Regional Reliability Standard.

The entity making the request, or the FRCC ~~OC and/or the PC~~RECCF, will prepare a draft of the proposed FRCC Regional Reliability Standard and submit it to the FRCC Standards ~~Process Manager~~and Registration staff for urgent action. The submission must include a justification for the urgent action. ~~The~~FRCC Standards ~~Process Manager~~and Registration staff shall immediately ~~post~~without delay initiate the FRCC Regional Reliability Standards Development Process by posting the draft as specified in Step 5. The posting shall be a

minimum of ten (10) calendar days before the ~~RBB~~Registered Ballot Body can consider the draft for approval. All comments received during the posting will be considered. Once approved by the ~~RBB~~Registered Ballot Body, the proposed urgent FRCC Regional Reliability Standard will be sent to the FRCC Board of Directors for adoption.

A FRCC Regional Reliability Standard that is adopted by the FRCC Board of Directors, as an urgent action shall have a termination date specified that shall not exceed one hundred eighty (180) calendar days from the approved date. Should there be a need to make the FRCC Regional Reliability Standard permanent, the replacement FRCC Regional Reliability Standard would be required to go through the full standards development process.

An urgent action FRCC Regional Reliability Standard that expires may be renewed by the FRCC Board of Directors using the urgent action process again, in the event a permanent FRCC Regional Reliability Standard has not been adopted. In determining whether to authorize the extension of an urgent action FRCC Regional Reliability Standard, the FRCC ~~OC and/or the PC~~Board of Directors will request the FRCC RECCF to provide a recommendation to the Board. The FRCC RECCF shall consider the impact to the reliability of the FRCC Bulk ~~Electric~~Power System of not continuing the FRCC Regional Reliability Standard. ~~In addition, and~~ consideration will be given to whether expeditious progress is being made toward a permanent replacement.

The FRCC ~~OC and/or the PC~~RECCF shall not request the FRCC Board of Directors to extend an urgent action FRCC Regional Reliability Standard if there is insufficient progress toward adopting a permanent replacement FRCC Regional Standard or if the FRCC ~~OC and/or the PC~~RECCF lack confidence that a reasonable completion date is achievable. The intent is to ensure that an urgent action FRCC Regional Reliability Standard does not in effect take on a degree of permanence due to the lack of an expeditious effort to develop a permanent replacement FRCC Regional Reliability Standard. With these principles, there is no pre-determined limit on the number of times an urgent action may be renewed. ~~However, each~~

Each urgent action FRCC Regional Reliability Standard renewal shall be effective only upon adoption by the FRCC Board of Directors, and approval by NERC and FERC.

Interpretations of Standards

3.5.2 Regional Definition Development

NERC maintains a glossary of approved terms, entitled the “Glossary of Terms Used in NERC Reliability Standards.” The glossary includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. There are two sections to the glossary. The first section includes definitions for terms used in continent-wide standards, and the second section includes definitions for terms used in Regional standards that have been adopted by the NERC Board of Trustees. The *Glossary of Terms* is intended to provide consistency throughout the Reliability Standards.

There are several methods that can be used to add, modify or retire a defined term used in a FRCC Regional Reliability Standard.

- Anyone can use a SAR to submit a request to add, modify, or retire a defined term.
- A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.

The following considerations should be made when considering proposals for new or revised definitions:

- Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by another Region, the same definition should be adopted if needed to support an FRCC Regional Reliability Standard.
- If a term is used in a Reliability Standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the *Glossary of Terms Used in NERC Reliability Standards*.
- If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved standards.
- When practical, where the North American Energy Standards Board (NAESB) has a definition for a term, the drafting team shall use the same definition to support a NERC standard.

Any definition that is balloted separately from a proposed new or modified standard or from a proposal for retirement of a standard shall be accompanied by an implementation plan.

If a SAR is submitted to the FRCC Standards and Registration staff with a proposal for a new or revised definition, the FRCC RECCF shall consider the urgency of developing the new or revised definition and may direct FRCC Standards and Registration staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR

identifies a term that is used in a standard already under revision by a drafting team, the FRCC RECCF may direct the drafting team to add the term to the scope of the existing project. Any proposal for a new or revised definition shall be processed in accordance with Section III. Steps in Developing a FRCC Regional Reliability Standard of this procedure.

~~Any member of the FRCC, or group within the FRCC, or an entity that is directly and materially affected by reliability of the FRCC Bulk Power System shall be permitted to request an interpretation of a FRCC Regional Reliability Standard. The entity requesting an interpretation shall send a request to the FRCC Standards Process Manager explaining the specific circumstances surrounding the request and what clarifications are required as applied to those circumstances. The request should indicate the material impact to the requesting party, or others, caused by the lack of clarity or a possible incorrect interpretation of the FRCC Regional Reliability Standard. The FRCC Standards Process Manager will assemble a team with the relevant expertise to address the clarification.~~

~~As soon as practical (but not more than thirty (30) calendar days following the receipt of the request), the team will draft a written interpretation of the FRCC Regional Reliability Standard addressing the issues raised. The FRCC Standards Process Manager will submit the written interpretation to the OC and/or PC for review and approval. If approved by the FRCC OC and/or the PC, the interpretation is appended to the FRCC Regional Reliability Standard and is effective immediately. The interpretation will stand until such time as the FRCC Regional Reliability Standard is revised through the normal process, at which time the FRCC Regional Reliability Standard will be modified to incorporate the clarifications provided by the interpretation.~~

1.3.23.5.3 Appeals

Any member of the FRCC, or group within the FRCC, or any entity that is directly and materially affected by reliability of the FRCC Bulk Power System, and who feel they have been or will be adversely affected by any ~~substantive or~~ procedural action or inaction related to the development, approval, revision, or withdrawal of a FRCC Regional Reliability Standard shall have the right to appeal. This appeals process applies only to the *FRCC Regional Reliability Standards Process* as defined in this document.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made within thirty (30) calendar days of the date of the action purported to cause the adverse effect. The final decisions of any appeal shall be documented in writing and posted on the FRCC public website. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.

The appeals process provides two levels, with the goal of expeditiously resolving the issue to the satisfaction of the participants:

1.3.2.13.5.3.1 Level 1 Appeal

Level 1 is the required first step in this appeals process. The appellant submits to the FRCC [Manager of Standards Process Manager and Registration](#) a complaint in writing that describes the substantive or procedural action associated with a FRCC Regional Reliability Standard or the *FRCC Regional Reliability Standards Process*. The appellant ~~describes~~must describe in the complaint, the actual or potential adverse impact to the appellant. Assisted by any necessary staff and committee resources, the FRCC [Manager of Standards Process Manager and Registration](#) shall prepare a written response addressed to the appellant as soon as practical but not more than forty-five (45) calendar days after receipt of the complaint. If the appellant accepts the response as a satisfactory resolution of the issue, both the complaint and response will be made a part of the record associated with the FRCC Regional Reliability Standard.

1.3.2.23.5.3.2 Level 2 Appeal

If after the Level 1 Appeal, the appellant remains unsatisfied with the resolution, notification shall be made in writing to the FRCC [Manager of Standards Process Manager and Registration](#). Within thirty (30) calendar days of receiving the notification, the FRCC [Manager of Standards Process Manager and Registration](#) shall convene a Level 2 Appeals Panel. This panel shall consist of five members appointed by the FRCC Board of Directors. In all cases, Level 2 Appeals Panel members shall have no direct affiliation with the participants in the appeal.

The FRCC [Manager of Standards Process Manager and Registration](#) shall post on the FRCC public website the notice of the Level 2 appeal and other relevant materials. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator. At least fifteen (15) calendar days' notice of the meeting of the Level 2 Appeals Panel will be made. In addition to the appellant, any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System, and who is directly and materially affected by the substantive or procedural action referenced in the complaint shall be heard by the panel.

The Level 2 Appeals Panel shall not consider any expansion of the scope of the appeal that was not presented in the Level 1 Appeal. The Level 2 Appeals Panel may in its decision find for the appellant and remand the issue to the FRCC ~~OC and/or the~~ [PCRECCF](#) for resolution with a statement of the issues and facts in regard to which fair and equitable action was not taken. The Level 2 Appeals Panel may find against the appellant with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections.

The Level 2 Appeals Panel may not, however, revise, approve, disapprove, or adopt a FRCC Regional Reliability Standard, as these responsibilities remain with the FRCC Board of Directors. The actions of the Level 2 Appeals Panel shall be posted on the FRCC public website. Notice of the posting will be sent to (1) the Registered Ballot ~~body~~Body, (2) the FRCC standing committees, subcommittees and working groups, (3)

the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.

1.4.3.6 VI. Maintenance of the FRCC Regional Reliability Standards and Process

1.4.13.6.1 Requests to Revise the FRCC Regional Reliability Standard Development Process

Any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, or any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System may submit a written request to modify the *FRCC Regional Reliability Standard Development Process Manual*. The FRCC Standards ~~Process~~ Manager and Registration staff shall oversee the handling of the request. ~~The FRCC OC Standards and/or the PC Registration staff shall review the request and submit recommendations~~ prioritize all requests, merge related requests, and respond to the FRCC Board of Directors for consideration. The FRCC Board of Directors, on its own motion, may amend the FRCC Regional Reliability Standard Process. ~~each requestor within thirty (30) calendar days.~~

The FRCC Standards and Registration staff shall post the proposed revisions for a thirty (30) calendar day formal comment period. Based on the degree of consensus for the revisions, the FRCC Standards and Registration staff shall:

- a.) Submit the revised process or processes for Ballot Pool approval;
- b.) Repeat the posting for additional inputs after making changes based on comments received;
- c.) Remand the proposal to the requestor for further work; or
- d.) Reject the proposal.

The Registered Ballot Body shall be represented by a Ballot Pool. The ballot procedure shall be the same as that defined for approval of a FRCC Regional Reliability Standard, including the use of subsequent ballots (additional or Final Ballots), as necessary. If the proposed revision is approved by the Ballot Pool, the FRCC Standards and Registration staff shall submit the revised procedure to the FRCC Board of Directors for adoption. The FRCC Standards and Registration staff shall submit to the board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and applicable governmental authorities.

1.4.23.6.2 Five-Year Review of FRCC Regional Reliability Standards

Each FRCC Regional Reliability Standard developed through FRCC Regional Reliability Standard Development Process shall be reviewed at least once every five ~~(5)~~ years. ~~The review date will be determined from the effective date or of the latest revision date whichever standard.~~

If a FRCC Regional Reliability Standard is later than nearing its five-year review and has issues that need resolution, then a FRCC Regional Reliability Standard Development project will be initiated for the complete review process shall be conducted and associated revision of that standard that includes addressing all outstanding governmental directives and all unresolved issues identified by stakeholders. The standard development project will be processed in accordance with Section III. Steps 1 through 10 of the *Developing a FRCC Regional Reliability Standard Development Process Manual*. As a result of this procedure.

If a FRCC Regional Reliability Standard is nearing its five-year review, a FRCC Regional Reliability Standard shall and there are no outstanding governmental directives or unresolved stakeholder issues associated with that standard, then a FRCC Regional Reliability Standard Development project will be initiated solely for the “five-year review” of that standard and will be addressed by the following process.

For a project that is focused solely on the five-year review, the FRCC RECCF shall appoint a review team of subject matter experts to review the FRCC Regional Reliability Standard and recommend whether the standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a thirty (30) calendar day formal stakeholder comment period and shall provide those stakeholder comments to the FRCC RECCF for consideration.

- If a review team recommends reaffirming a FRCC Regional Reliability Standard, the FRCC RECCF shall submit the reaffirmation to the FRCC Board of Directors for concurrence. Reaffirmation does not require approval by stakeholder ballot.
- If a review team recommends modifying or withdrawing a FRCC Regional Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the FRCC RECCF for acceptance as a new project. Each existing standard recommended for modification or withdrawal shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the standard is approved by its ballot pool, adopted by the FRCC Board of Directors, and approved by applicable governmental authorities.

In the case of reaffirmation of a FRCC Regional Reliability Standard, the standard shall remain in effect pending the results of the next five-year review or until the standard is otherwise modified or withdrawn by a separate action.

1.4.33.6.3 Filing of FRCC Regional Standards with Regulatory Agencies

All adopted FRCC Regional Reliability Standards will be filed with ~~FERC~~the NERC Board of Trustees for adoption and subsequently filed with FERC for approval.

APPENDIX**4.0 References**[Ten Benchmarks for Excellent Reliability Standards](#)[FRCC Bylaws](#)[NERC Regional Standards Review Procedure](#)[NERC Glossary of Terms Used in Reliability Standards](#)[NERC Regional Reliability Standards Evaluation Procedure](#)**5.0 Attachments****Attachment A****Email completed form to FRCCStandard@frcc.com****: FRCC Regional Reliability Standard Request Authorization Form**[Attachment B: Process Diagram](#)[Attachment C: Development of and Voting of the Registered Ballot Body](#)**6.0 Review and Modification History**

<u>Review and Modification Log</u>				
<u>Date</u>	<u>Version Number</u>	<u>Title of Proposed Standard or Modification</u>	<u>Description of Review</u>	<u>Sections Affected</u>
TBD	1	Revised Procedure/New Template		All
9/25/2007	0	Amended		All
10/24/2006	0	Amended		All
7/25/2006	0	Amended		All
3/2/2006	0	New Process		All

Attachment A

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
3000 BAYPORT DRIVE, SUITE 600
TAMPA, FLORIDA 33607-8410
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

FRCC Regional Reliability Standard Request Form

[Email completed form to FRCCStandard@frcc.com](mailto:FRCCStandard@frcc.com)

Title of Standard

Request Date

<i>Requestor Information</i>	TYPE (Check a box for each one that applies)
Name	<input type="checkbox"/> New Standard
Primary Contact	<input type="checkbox"/> Revision to existing Standard
Telephone	<input type="checkbox"/> Withdrawal of existing Standard
Fax	
Email	<input type="checkbox"/> Urgent Action

Purpose (Describe the purpose of the standard – what the standard will achieve in support of reliability)

Industry Need (Provide at a detailed statement justifying minimum, a discussion of the need for reliability-related impact of not developing the proposed new standard, along with any supporting documentation) and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.

Brief Description (Describe the proposed standard in sufficient detail to clearly define the scope in a manner that can be easily understood by others).

FRCC Regional Reliability Standard Request Form (cont.)

The Standard will Apply to the Following Functions (Check box for each one that applies)

<input type="checkbox"/>	Reliability Coordinator	Ensures <u>Responsible for the real-time operating</u> reliability of the bulk transmission system within its <u>it</u> Reliability Authority Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.
<input type="checkbox"/>	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within its metered boundary <u>balancing authority</u> and supports system frequency in real time.
<input type="checkbox"/>	Planning Authority	Plans the Bulk Electric System <u>Assesses the longer-term reliability of its Planning Coordinator Area.</u>
<input type="checkbox"/>	Resource Planner	Develops a long term <u>one-year</u> plan for the resource adequacy of specific loads within a Planning Authority Coordinator area
<input type="checkbox"/>	Transmission Planner	Develops a long term <u>one-year</u> plan for the reliability of transmission systems <u>the interconnected Bulk Electric System</u> within its portion of the Planning Authority Coordinator area.
<input type="checkbox"/>	Transmission Service Provider	Provides <u>Administers the transmission tariff and provides the transmission services to qualified market under applicable transmission service agreements (e.g., the pro forma tariff).</u>
<input checked="" type="checkbox"/>	Transmission Owner	Owens <u>and maintains</u> transmission facilities
<input type="checkbox"/>	Transmission Operator	Operates and maintains the transmission facilities, and executes switching orders.
<input type="checkbox"/>	Distribution Provider	Provides and operates <u>Delivers electrical energy to the "wires" between the transmission system and the end-use customer.</u>
<input type="checkbox"/>	Generator Owner	Owens and maintains generation unit(s) <u>facilities.</u>
<input type="checkbox"/>	Generator Operator	Operates generation units(s) <u>to provide real and performs the functions of supplying energy and Interconnected Operations Services reactive power.</u>
<input checked="" type="checkbox"/>	Purchasing-Selling Entity	The function of purchasing or selling energy, capacity, and all necessary Interconnected Operations Services as required
<input checked="" type="checkbox"/>	Load-Serving Entity	Secures energy and transmission (and related generation services) to serve the end user

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~~FRCC Regional Reliability Standard Request Form~~

FRCC Regional Reliability Standard Request Form (cont.)

NERC Reliability Principles

<i>Applicable Reliability Principles (Check box for all that apply.)</i>	
<input type="checkbox"/>	1. Interconnected bulk electric systems <u>Bulk Electric Systems</u> shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk electric systems <u>Bulk Electric Systems</u> shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk electric systems <u>Bulk Electric Systems</u> shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk electric systems <u>Bulk Electric Systems</u> shall be developed, coordinated, maintained, and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring, and control shall be provided, used, and maintained for the reliability of interconnected bulk electric systems <u>Bulk Electric Systems</u> .
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk electric systems shall be assessed, monitored, and maintained on a wide-area basis.

FRCC Regional Reliability Standard Request Form (cont.)**NERC Market Interface Principles**

Does the proposed Standard comply with all of the following Market Interface Principles?

~~Recognizing that reliability is an essential requirement of a robust North American economy:~~

yes or no <input type="checkbox"/> <input type="checkbox"/>	1. A reliability standard <u>Reliability Standard</u> shall not give any market participant an unfair competitive advantage.
yes or no <input type="checkbox"/> <input type="checkbox"/>	2. A reliability standard <u>Reliability Standard</u> shall neither mandate nor prohibit any specific market structure.
yes or no <input type="checkbox"/> <input type="checkbox"/>	3. A reliability standard <u>Reliability Standard</u> shall not preclude market solutions to achieving compliance with that standard.
yes or no <input type="checkbox"/> <input type="checkbox"/>	4. A reliability standard <u>Reliability Standard</u> shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards <u>Reliability Standards</u> .

FRCC Regional Reliability Standard Request Form

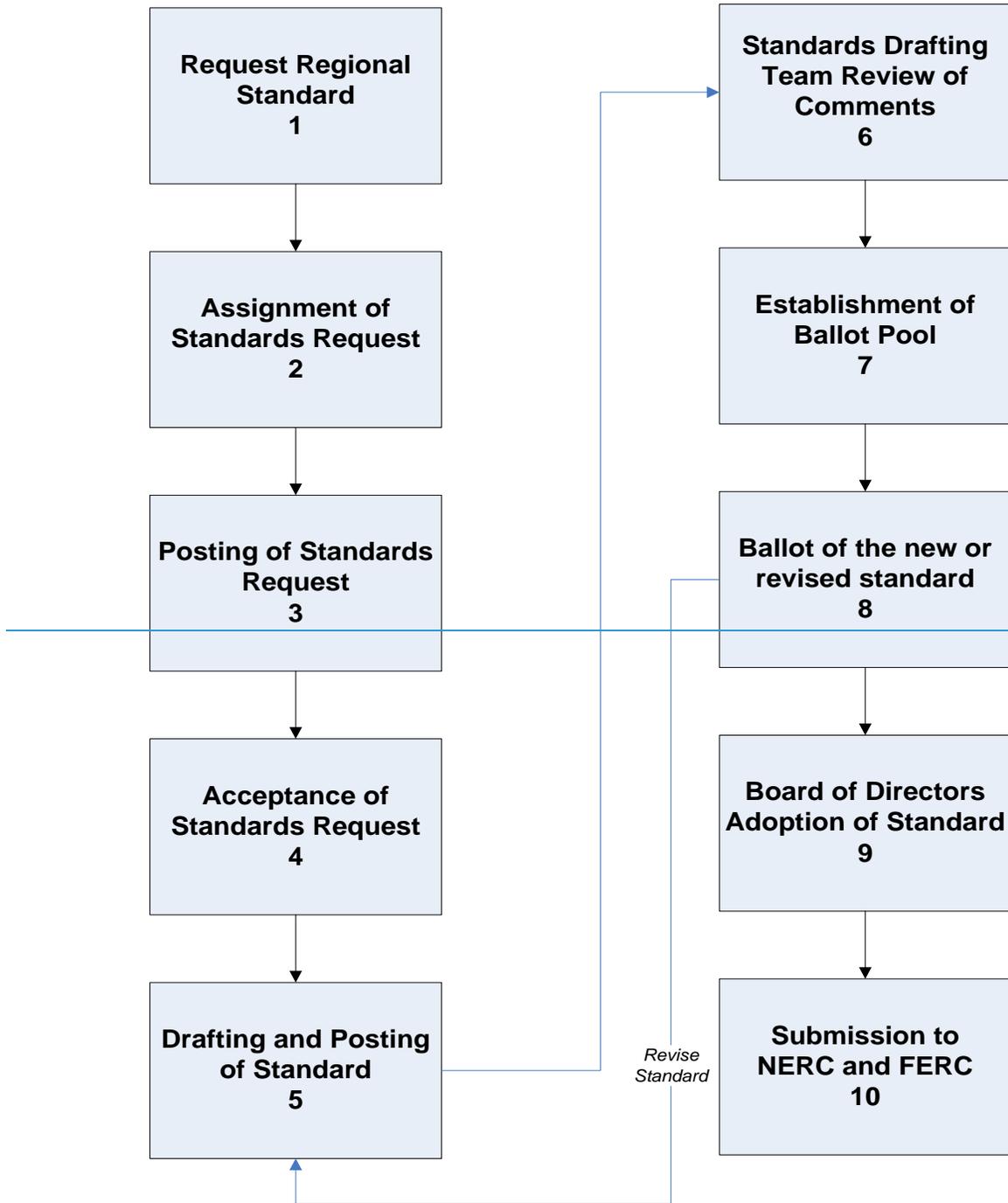
Related Standards

Standard No.	Explanation

<p><u>Proposed Implementation</u> _____ <u>days after Board of Directors adoption or</u></p> <hr/> <p><u>On (date):</u></p>
--

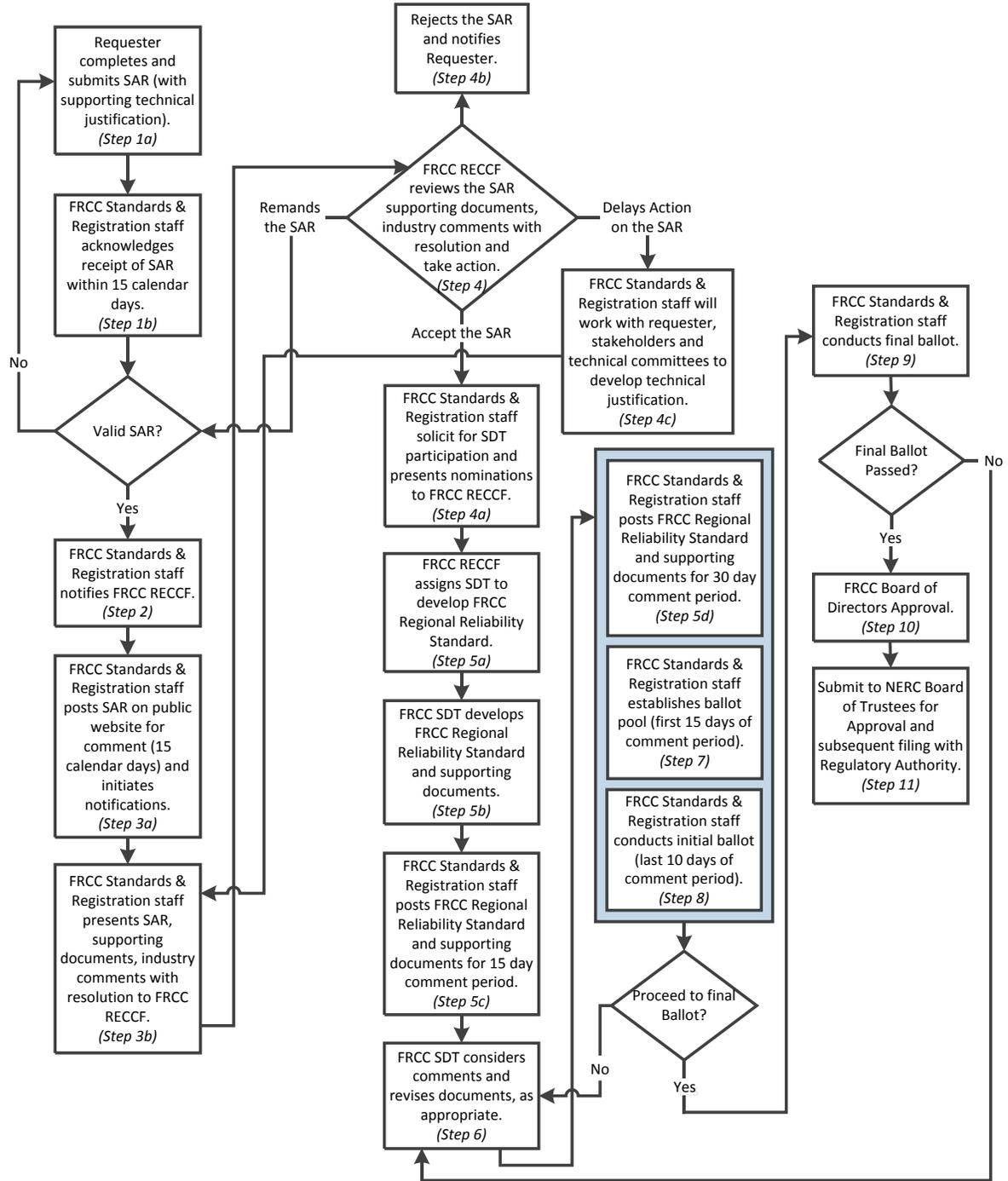
APPENDIX B

Process Diagram



APPENDIX

Attachment B
FRCC Regional Reliability Standard Development Process Flowchart



Attachment C

FLORIDA RELIABILITY COORDINATING COUNCIL, INC.
3000 BAYPORT DRIVE, SUITE 600
TAMPA, FLORIDA 33607-8410
PHONE 813.289.5644 • FAX 813.289.5646
WWW.FRCC.COM

Development of and Voting of the Registered Ballot Body**1. Registration Procedures**

The Registered Ballot Body ~~(RBB)~~ comprises all entities² and persons that:

- Qualify for one of the FRCC Industry Sectors, and
- Are registered with the FRCC as potential ballot participants in the voting on FRCC Regional Reliability Standards.

All registrations will be done electronically. All entities and persons will self-select to belong to the ~~RBB~~ Registered Ballot Body. The sectors shall be identical to those in Section 1.2 of the *FRCC Bylaws*.

All ~~RBB~~ Registered Ballot Body members will have the ability to vote on a standard. Voting will be done in writing (either email or facsimile) with each ~~RBB~~ Registered Ballot Body member having one vote. The ~~RBB~~ Registered Ballot Body representative will have the right to register and participate in ballot pools to cast their vote on a standard being considered for approval.

2. Sector Qualification Guidelines

The general guidelines are as follows:

- An entity or person may register in the ~~RBB~~ Registered Ballot Body in any Sector in which it qualifies for provided that an entity or person registers as a potential ballot participant in only one (1) Sector.
- Any individual currently employed by an organization that is eligible to join one or more of the other five (5) sectors, shall not be qualified to join as a General Sector ~~RBB~~ Registered Ballot Body member.

3. Ballot Pool Voting

² An entity and all of its Affiliates (as defined in the FRCC Bylaws) shall be considered one entity for purposes of registering as a potential ballot participant.

A Ballot Pool will be established to vote on any proposed standards action. Each [RBBRegistered Ballot Body](#) member choosing to belong to a Ballot Pool will have one individual vote. Two-thirds of the individual votes³ of the Ballot Pool shall constitute a quorum.

Approval of a FRCC Regional Reliability Standard requires the affirmative vote of a two-thirds majority of the weighted sector votes cast. ~~The number of votes cast in each sector is the sum of the affirmative and negative votes, excluding abstentions.~~

The following steps will be used to determine if there ~~is~~[are](#) sufficient affirmative votes:

- 3.1. The number of affirmative votes cast in each sector will be divided by the sum of affirmative and negative votes cast to determine the fractional affirmative vote for each sector. ~~Abstentions~~[Negative votes without comments and abstentions](#) will not be counted.
- 3.2. The fractional affirmative vote for a sector will then be multiplied by the Sector Weight Factor to determine the weighted fractional affirmative vote for a sector.

The Sector Weight Factors are:

Suppliers Sector: Weight Factor = 2.5
 Non-Investor Owned Utility Wholesale Sector: Weight Factor = 2.0
 Load Serving Entity Sector: Weight Factor = 1.0
 Generating Load Serving Entity Sector: Weight Factor = 3.0
 Investor Owned Utility Sector: Weight Factor = 3.5
 General Sector: Weight Factor = 1.0

~~3.2.3.3.~~ The sum of the weighted fractional affirmative votes from all sectors divided by the sum of the weights of the sectors voting will be used to determine if a two-thirds majority has been achieved. A sector will be considered as “voting” if any member of the sector in the Ballot Pool casts either an affirmative or negative vote.

~~3.3.3.4.~~ A FRCC Regional Reliability Standard will be considered “approved” if the sum of the weighted fractional affirmative votes from all sectors divided by the sum of the weights of the voting sectors is two-thirds or greater.

~~3.4. History of Revisions~~

~~Approved March 2, 2006~~

3.5. [Each member of the Ballot Pool may vote one of the following positions:](#)

[Affirmative](#)
[Affirmative, with comment](#)
[Negative without comment](#)

³ [Quorum is determined based on the individual votes cast \(affirmative, negative, negative without comments and abstentions\)](#)

Negative with comments (if possible reasons should include specific wording or actions that would resolve the objection)

Abstain

3.6. Each Ballot Pool member submitting a negative vote with comments shall determine if the response provided by the drafting team satisfies those stated concerns. Each such balloter shall be informed of the appeals process contained within this manual.

3.7. If a standard achieves a quorum and there are no negative votes with comments from the initial ballot, and the overall approval is at least two thirds (weighted by segment) then the results of the Initial Ballot shall stand as final and the draft Reliability Standard and associated implementation plan shall be deemed to be approved by its Ballot Pool.

~~Amended July 25, 2006~~

~~Amended October 24, 2006~~

~~Amended September 25, 2007~~

ATTACHMENT 3:

Florida Reliability Coordinating Council Regional Reliability Standard Development Process
Manual Revisions Summary Document

Original	Revision	Remarks
		Updated document to conform to new company-wide procedural template.
Section 3.0 FRCC Regional Reliability Standards Development Process		
Section 3.1 FRCC Regional Reliability Standard Principles		
Openness Participation is open to any interested party or any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System. Participation shall not be conditional upon membership in the FRCC. All FRCC Regional Reliability Standard development meetings will be open and noticed on the FRCC website.	Open Participation – Participation in FRCC’s regional standards development, balloting and approval processes is open to all entities that are directly and materially affected by FRCC reliability standard or the reliability of the FRCC Bulk Power System. There shall be no financial barriers to participation in the FRCC’s regional standards development, balloting or approval processes. Participation in FRCC’s regional standards development, balloting and approval processes shall not be conditional upon membership in any organization, nor unreasonably restricted on the basis of technical qualifications or other such requirements. All FRCC Regional Reliability Standard development meetings will be publically noticed on the FRCC website.	Provided additional clarifying verbiage to demonstrate that there are no barriers that would prevent any party or entity from participating in the FRCC Regional Standard Development Process.
Section 3.2.6 Elements of a Reliability Standard		
A FRCC Regional Reliability Standard shall consist of the elements identified in this section of this manual. These elements are intended to apply a systematic discipline in the development and revision of Reliability Standards. The format allows a clear statement	A FRCC Regional Reliability Standard includes many elements designed to work collectively to identify what entities must do to meet their reliability-related obligations as an owner, operator or user of the FRCC Bulk Power System. Elements that are considered mandatory and enforceable are identified below. The elements of a reliability standard include the following:	Provided additional clarifying verbiage in the introduction of the section to improve the text and style of language as well as to correct grammatical inconsistencies.
Section 3.2.7 Nomination, Modification, or Withdrawal of A Regional Standard		
	A FRCC Standard Authorization Request (SAR) is the form used to document the scope and reliability benefit of a proposed project for one or more new or modified standards or the benefit of retiring one or more approved standards. Any entity or individual may propose the development of a new or modified	Introduction of the use of a Standard Authorization Request (SAR) in a more direct manner. Was not stated in the previous version of the process document.

	<p>standard, or may propose the retirement of a standard, by submitting a completed SAR to the FRCC standards and registration staff at FRCCStandard@frcc.com.</p> <p>Each SAR that proposes a “new” standard, should be accompanied with a technical justification that includes, as a minimum, a discussion of the reliability-related impact of not developing the new standard, and a technical foundation document (e.g., research paper), when needed, to guide the development of the standard.</p>	
Section 3.3.1 FRCC Board of Directors		
<p>FRCC Board of Directors – The FRCC Board of Directors shall consider for adoption as FRCC Regional Reliability Standards, those Standards that have been developed and approved by this process. Once the Board adopts a FRCC Regional Reliability Standard, such Standard shall be submitted to NERC for approval. When approved by NERC, it will be submitted to FERC for approval.</p>	<p>The FRCC Board of Directors shall consider for adoption FRCC Regional Reliability Standards, definitions, and associated implementation plans that have been developed and approved by the processes identified in this manual. In addition, the board shall consider for approval, VRFs and VSLs associated with each approved standard. Once the Board adopts a FRCC Regional Reliability Standard, or definition, or once the Board approves VRFs or VSLs, the Board shall direct FRCC standards and registration staff to file the document(s) for approval with the applicable regulatory authorities.</p>	<p>Provided additional clarifying verbiage to include FRCC BOD responsibilities that were not specifically identified in the previous version of the document (i.e. consider for adoption ‘definitions’ and associated ‘implementation plans’). Incorporated language to address the FRCC BOD responsibilities associated with VRFs and VSLs (VRFs and VSLs were not addressed in the previous version of the FRCC RRSPM.).</p>
Section 3.3.4 FRCC Regional Entity Committee and Compliance Forum (RECCF)		
<p>FRCC Operating Committee (OC) and FRCC Planning Committee (PC) – The FRCC OC and the FRCC PC (both of which are balanced stakeholder committees, see Appendix C) shall have the primary responsibility for the development, modification or withdrawal of FRCC Regional Reliability Standards.</p>	<p>The FRCC RECCF, a balanced stakeholder committee, is responsible for managing the standards processes for the development of standards, VRFs, VSLs, and definitions in accordance with this manual. The responsibilities of the FRCC RECCF are defined in detail in the committee scope document.</p> <p>Per Section 3.4 of this manual, the FRCC RECCF has the right to remand work to a drafting team, to reject the work of a drafting team, or to accept the</p>	<p>The FRCC Regional Entity (RE) Operating Committee (OC) and Regional Entity Planning Committee (PC) where the original committees responsible for oversight of the FRCC RRSDP. Reorganization of the committee structure at the FRCC RE resulted in the elimination of the FRCC RE OC and PC and the establishment of the FRCC Regional Entity Committee and Compliance Forum (RECCF). Updated language to reflect the RECCF as the new oversight authority for the FRCC RRSDP. The RECCF committee scope document</p>

	<p>work of a drafting team. The FRCC RECCF may direct a drafting team to revise its work to follow the processes in this manual or to meet the criteria for the ERO’s benchmarks for reliability standards, or to meet the criteria for governmental approval, however the FRCC RECCF shall not direct a drafting team to change the technical content of a draft standard. The FRCC RECCF shall meet at regularly scheduled intervals (either in person, or by other means). At the invitation of the FRCC RECCF Chair, interested parties may attend committee meetings as guests when actions related to the standards development process are being discussed or acted on. Committee guests shall not be permitted to participate in committee voting and may not be counted in determining the existence of a quorum.</p>	<p>will be updated following regulatory approval of the FRCC RRSDF.</p> <p>Section 3.4 has been updated to identify specific responsibilities associated with the oversight activities of the FRCC RECCF.</p>
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Section 3.3.5 FRCC Standards and Registration Staff

<p>FRCC Standards Process Manager – The FRCC Regional Reliability Standard Development Process shall be administered by the FRCC Standards Process Manager. The FRCC Standards Process Manager will ensure the integrity of the process and the consistency of quality and completeness of the FRCC Regional Reliability Standards. The FRCC Standards Process Manager will facilitate all steps in this process, and will coordinate with NERC to ensure required information is posted on both NERC and FRCC websites.</p>	<p>The FRCC standards and registration staff, led by the Manager of Standards and Registration, is responsible for administering FRCC’s Reliability Standards Processes in accordance with this manual. The standards and registration staff provides support to the FRCC RECCF in managing the standards processes and supporting the work of all drafting teams. The standards and registration staff work to ensure the integrity of the standards processes and consistency of quality and completeness of the reliability standards. The standards and registration staff facilitates all steps in the development of standards, definitions, and associated implementation plans. The standards and registration staff work with drafting teams in developing VRFs and VSLs for each standard.</p> <p>The FRCC standards and registration staff shall coordinate a quality review of the “final draft” of the reliability standard, it’s implementation plan, and VRFs and VSLs to assess whether the</p>	<p>Provided additional clarifying verbiage to include FRCC Standards and Registration staff’s responsibilities that were not specifically identified in the previous version of the document. Incorporated language to specifically address the FRCC Standards and Registration staff’s responsibilities associated with VRFs and VSLs development (VRFs and VSLs were not addressed in the previous version of the FRCC RRSPM.), staff reviews of Standard Development documents and coordination with the RECCF.</p>
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	<p>documents are within the scope of the associated SAR, whether the standard is clear and enforceable as written, and whether the standard meets the criteria specified in the NERC and FERC guidelines. This review shall normally be completed within thirty (30) calendar days¹ of receipt of the final version of the documents from the Standard Drafting Team (SDT). The detailed results of this review shall be provided to the SDT and the FRCC RECCF with a recommendation on whether the documents are ready for formal posting and balloting.</p> <p>If the FRCC RECCF agrees that the proposed reliability standard, implementation plan, and VRFs and VSLs pass this review, the FRCC RECCF shall authorize posting for a formal comment period, ballot (for the standard and implementation plan), and non-binding poll (for VRFs and VSLs) as soon as the work flow will accommodate.</p> <p>If the FRCC RECCF finds that any of the documents do not meet the specified criteria, the FRCC RECCF shall remand the documents to the SDT for additional work.</p> <p>If the standard is outside the scope of the associated SAR, the SDT shall be directed to either revise the standard so that it is within the approved scope, or submit a request to expand the scope of the approved SAR. If the standard is not clear and enforceable as written, or if the standard or its VRFs and/or VSLs do not meet the specified criteria, the standard shall be returned to the SDT with specific identification of any requirement that is deemed to be unclear or unenforceable as written.</p>	
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¹ Time periods specified in this manual may be extended as deemed appropriate by FRCC Staff. When business days are specified, this provision could be used to take into account different US holiday schedules. When calendar days are specified, this provision could be used to take into account due dates that fall on a weekend.

	<p>The standards and registration staff is responsible for presenting standards, and definitions to the FRCC Board of Directors for adoption. When presenting standards-related documents to the FRCC Board of Directors for adoption or approval, the standards and registration staff shall report the results of the associated stakeholder ballot, including identification of any unresolved minority stakeholder issues.</p>	
Section 3.3.6 Drafting Teams		
<p>Standard Drafting Team – A team of technical experts, such as FRCC Subcommittees. Working Groups, Task Forces, or the FRCC Staff, will be appointed by the FRCC OC and/or PC that will:</p> <ul style="list-style-type: none"> Develop the details of the FRCC Regional Reliability Standards, Consider and respond to industry comments, Participate in forums to help build consensus on draft FRCC Regional Reliability Standards, Assist in the implementation of approved FRCC Regional Reliability Standards Provide technical oversight in response to changing industry conditions, Assist in the identification of the needed for new FRCC Regional Reliability Standards. 	<p>The FRCC RECCF shall appoint industry subject matter experts to drafting teams to work with stakeholders in developing and refining SARs, standards, VRFs, VSLs and definitions. Each drafting team consists of a group of technical experts that work cooperatively with the support of the standards and registration staff. The technical experts provide subject matter expertise and guide the development of the technical aspects of the standard. The technical experts maintain authority over the technical details of the standard. Each drafting team appointed to develop a standard is responsible for following the processes identified in this manual as well as procedures developed by the FRCC RECCF from the inception of the assigned project through the final acceptance of that project by applicable governmental authorities.</p> <p>Collectively, each drafting team will:</p> <ul style="list-style-type: none"> Draft proposed language for the reliability standards, definitions, and associated implementation plans. Solicit, consider, and respond to comments related to the specific standards development project. 	<p>Provided additional clarifying verbiage to include responsibilities associated with the establishment of Standard Drafting Teams (SDTs). Additionally, provided clarifying verbiage to include the responsibilities of the SDT that were not specifically identified in the previous version of the document. For example: incorporated language to specifically address the FRCC SDT responsibilities associated with drafting of standard, definition and/or implementation plans, the use of informal and formal consensus building through participation in various industry forums, VRFs and VSLs development (VRFs and VSLs were not addressed in the previous version of the FRCC RRSPM.) and the reporting relationship with the RECCF.</p>

	<p>Participate in industry forums to help build consensus on the draft reliability standards, definitions, and associated implementation plans. Assist in developing the documentation used to obtain approval and subsequent filing of the reliability standards, definitions and associated implementation plans.</p> <p>The FRCC standards and registration staff shall provide a member to support the team with technical writing expertise and shall provide administrative support to the team, guiding the team through the steps in completing its project. The individuals provided by the standards and registration staff serve as advisors to the drafting team and do not have voting rights. The FRCC RECCF may also supplement the membership of a standard drafting team at any time to ensure the necessary competencies and diversity of views are maintained throughout the standard development effort. All drafting teams report to the FRCC RECCF.</p>	
Section 3.3.7 Governmental Authorities		
	<p>The Federal Energy Regulatory Commission (FERC) in the United States of America has the authority to approve each new, revised or withdrawn reliability standard, definition, VRF, and VSL following adoption or approval by the NERC Board of Trustees.</p>	<p>Section was added to identify the role of the applicable government authority (i.e. The Federal Energy Regulatory Commission (FERC)).</p>
3.3.8 FRCC Committees, Subcommittees, Working Groups, and Task Forces		
<p>Subcommittees, Working Groups, Task Forces, or the FRCC Staff, will be appointed by the FRCC OC and/or PC, that will: Develop the details of the FRCC Regional Reliability Standard, Consider and respond to industry comments,</p>	<p>FRCC’s technical committees, subcommittees, working groups, and task forces may provide technical research and analysis used to justify the development of new standards and may provide guidance, when requested by the FRCC RECCF, in overseeing field tests or collection and analysis of data. The technical committees, subcommittees,</p>	<p>The FRCC Regional Entity (RE) Operating Committee (OC) and Regional Entity Planning Committee (PC) where the original committees responsible for oversight of the FRCC RRS DP. Reorganization of the committee structure at the FRCC RE resulted in the elimination of the FRCC RE OC and PC and the establishment of the FRCC</p>

<p>Participate in forums to help build consensus on draft FRCC Regional Reliability Standards, Assist in the implementation of approved FRCC Regional Reliability Standards, Provide technical oversight in response to changing industry conditions, Assist in the identification of the need for new FRCC Regional Reliability Standards.</p>	<p>working groups, and task forces may provide feedback to drafting teams during both informal and formal comment periods.</p> <p>The technical committees, subcommittees, working groups, and task forces share their observations regarding the need for new or modified standards or requirements with the standards and registration staff for use in identifying the need for new standards projects.</p>	<p>Regional Entity Committee and Compliance Forum (RECCF). Updated language to clarify the relationship between the RECCF and the FRCC’s technical committees, subcommittees, working groups, and task forces.</p>
Section 3.4.1 Step 1 – Request a new FRCC Regional Reliability Standard or modification to, or withdrawal of an existing FRCC Regional Reliability Standard		
<p>A request to develop, modify or withdraw a FRCC Regional Reliability Standard shall be submitted to the FRCC Standards Process Manager (via email to FRCCStandard@frcc.com) by any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, or any interested party or any entity that is directly and materially affected by reliability of the FRCC Bulk Power System. The FRCC Standards Process Manager will acknowledge receipt of the request within fifteen (15) calendar days of its receipt.</p>	<p>Step 1a - A Standard Authorization Request (SAR) to develop, modify or withdraw a FRCC Regional Reliability Standard shall be submitted to the FRCC Standards and Registration staff (via email to FRCCStandard@frcc.com) by any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, or any interested party or any entity that is directly and materially affected by reliability of the FRCC Bulk Power System.</p> <p>Step 1b - The FRCC Standards and Registration staff shall acknowledge receipt of the request within fifteen (15) calendar days of its receipt.</p>	<p>Introduced language to identify the use of the Standard Authorization Request (SAR) as the mechanism to request the development, modification or withdrawal of a FRCC Regional Reliability Standard. Provided additional clarifying verbiage on the responsibilities of the FRCC Standards and Registration staff.</p>
Section 3.4.3 Step 3a – Posting of FRCC Regional Reliability Standard Request		
<p>The request for standard development, modification or withdrawal will be posted for notification and comment on the FRCC public website for a period of fifteen (15) calendar days, and will be reviewed by the FRCC OC and/or PC. A notice of the posting for comment will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek input on the proposed request.</p>	<p>The SAR will be posted for notification and comment on the FRCC public website for a period of fifteen (15) calendar days.</p> <p>For SARs that address the development of a new standard, the SAR will be posted for a fifteen (15) calendar day formal comment period. For SARs that are limited to modifications to or withdrawal of existing standards, the SAR will be posted for a fifteen (15) calendar day informal comment period.</p>	<p>Updated language to identify the use of the Standard Authorization Request (SAR) in this stage of the development process. Provided additional clarifying verbiage on ‘formal’ and ‘informal’ comments obtained through posting periods and the Drafting Teams obligations in responding to comments (formal and/or informal). Updated language to reflect the involvement of the RECCF.</p>

	<p>The intent of the formal comment periods is to solicit very specific feedback on the SAR and technical justification. A written response to each comment received is required.</p> <p>Feedback gathered from the informal comment period shall be publicly posted and, while a written response to each individual comment received is not required, a summary response that identifies how the comments were considered is required.</p> <p>A notice of the posting for comment shall be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.</p> <p>Step 3b - Following the comment period, the FRCC Standards and Registration staff shall present the SAR, supporting documents, industry comments with resolution to the FRCC RECCF for review.</p>	
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Section 3.4.4 Step 4 – Acceptance of a FRCC Regional Reliability Standard Request		
<p>The FRCC OC and/or the PC will review the request and any comments submitted to determine if the request received will be accepted or rejected within sixty (60) days of its submission. The decision will be posted and, if accepted, the OC and/or the PC will assign and direct a Standard Drafting Team to develop the draft Regional Reliability Standard. If the request is rejected, the FRCC Standards Process Manager will send notification to the entity making the request and to all entities that received the notice in Step 3 above.</p>	<p>Step 4 - The FRCC RECCF reviews the SAR, supporting documents, industry comments and resolutions and takes one of the following actions:</p> <p>Accept the SAR. Remand the SAR back to the requester and FRCC Standards and Registration staff for additional work. The FRCC RECCF will provide a written explanation for the remand. Reject the SAR. If the FRCC RECCF rejects a SAR, a written explanation for rejection will be provided to the requester within ten (10) calendar days of the rejection decision.</p>	<p>Updated language to identify the use of the Standard Authorization Request (SAR) in this stage of the development process. Updated language to reflect the involvement of the RECCF. Provided additional clarifying verbiage on the RECCF responsibilities associated with SAR disposition and the solicitation and selection of SDT members.</p>

	<p>Delay action on the SAR pending development of a technical justification for the proposed project.</p> <p>The review decision will be publically posted.</p> <p>Step 4a - If accepted, the FRCC RECCF will seek industry volunteers, establish the SDT to further develop the SAR (if necessary), draft the Regional Reliability Standard and to address comments submitted during the posting periods. The FRCC Standards and Registration staff will publicly post a request for fifteen (15) calendar days soliciting industry volunteers to participate on the SDT.</p> <p>Step 4a.1 - FRCC Standards and Registration staff will present a list of qualified candidates to the FRCC RECCF for potential assignment to the SDT.</p> <p>Step 4b - If the request is rejected, the FRCC Standards and Registration staff will send notification to the entity making the request.</p> <p>Step 4c - If the FRCC RECCF is presented with a SAR that proposes developing a new standard but does not have a technical justification upon which the standard can be developed, the FRCC RECCF shall delay action and direct the FRCC Standards and Registration staff to post the SAR for a thirty (30) calendar day comment period solely to collect stakeholder feedback on the scope of technical foundation, if any, needed to support the proposed project. If a technical foundation is determined to be necessary, the FRCC RECCF shall solicit assistance from FRCC’s technical committees or other industry experts in providing that foundation before authorizing development of the associated standard.</p>	
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Section 3.4.5 Step 5 – Drafting and Posting of a FRCC Regional Reliability Standard

The FRCC OC and/or PC will assign a Standard Drafting Team, within 60 days of acceptance of the request, to develop, in a timely manner, a draft FRCC Regional Reliability Standard that will address the accepted request. The FRCC OC and/or PC may provide a timeframe that is desired for completion of the standard development.

Under the direction of the FRCC OC and/or PC, the Standard Drafting Team, will consider all comments received on the posting of the standard request and will develop a draft FRCC Regional Reliability Standard and corresponding implementation plan.

The draft FRCC Regional Reliability Standard, implementation plan and any supporting documents shall be posted for comments on the FRCC public website for a period of fifteen (15) calendar days, or such longer period as determined by the drafting team or as directed by the FRCC OC and/or the PC. Notice of the posting will go out to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek comments.

Comments shall be submitted (via email) to the FRCC Standards Process Manager (FRCCStandard@frcc.com). All comments are due by the close of business on the 15th calendar day of posting, or such later date as determined by the drafting team or as directed by the FRCC OC and/or PC. If the comment due date falls on a weekend or nationally recognized holiday, the comments shall be due by the close of business on the next regularly scheduled business day.

Step 5a - The FRCC RECCF will assign a SDT, within sixty (60) calendar days of acceptance of the request, to develop, in a timely manner, a draft FRCC Regional Reliability Standard that will address the accepted request.

Step 5b - The SDT shall develop a project schedule and report progress, to the FRCC RECCF, against that schedule as requested by the FRCC RECCF.

The SDT, shall consider all comments received on the posting of the SAR and shall develop a draft FRCC Regional Reliability Standard and corresponding implementation plan.

The SDT shall develop a Reliability Standard that is within the scope of the associated SAR that includes all required elements as described earlier in this manual with a goal of meeting the quality attributes identified in the *Ten Benchmarks for Excellent Reliability Standards* and criteria for governmental approval. The team shall document its justification for the requirements in its proposed standard by explaining how each meets these criteria.

As the SDT drafts a Reliability Standard, that team is also required to develop an implementation plan to identify any factors for consideration when approving the proposed effective date or dates for the associated standard or standards. A single implementation plan may be used for more than one standard. As a minimum, the implementation plan shall include the following:

The proposed effective date (the date entities shall be compliant) for the requirements.

Updated process language to clarify individual ‘steps’. Updated language to reflect the involvement of the RECCF. Provided additional clarifying verbiage on the RECCF responsibilities associated with the formation of the SDT. Provided guidance to the SDT on Standard development, implementation plans and definitions (if appropriate). Introduced the SDT and FRCC Standards and Registration staff responsibilities associated with the development of VRFs and VSLs. Identified various methods for collecting industry feedback (i.e., formal and/or informal comment periods) and the process related obligations for each method. Introduced the ‘quality review’ of the new or modified standard, its associated VRFs and VSLs, and implementation plan.

	<p>Identification of any new or modified definitions that are proposed for approval with the associated standard.</p> <p>Whether there are any prerequisite actions that need to be accomplished before entities are held responsible for compliance with one or more of the requirements.</p> <p>Whether approval of the proposed standard will necessitate any conforming changes to any already approved standards – and identification of those standards and requirements.</p> <p>The functional entities that will be required to comply with one or more requirements in the proposed standard.</p> <p>The SDT shall work with FRCC Standards and Registration staff in developing a set of VRFs and VSLs that meet the latest criteria established by the NERC and governmental authorities. The SDT shall document its justification for selecting each VRF and for setting each set of proposed VSLs by explaining how its proposed VRFs and VSLs meet these criteria. FRCC Standards and Registration staff is responsible for ensuring that the VRFs and VSLs proposed for stakeholder review meet these criteria.</p> <p>Before the SDT has finalized its standard, implementation plan, VRFs and VSLs, the SDT should seek stakeholder feedback on its preliminary draft documents.</p> <p>The SDT may use a variety of methods to collect stakeholder feedback on preliminary drafts of its documents, including the use of informal comment periods, webinars, industry meetings, workshops, or other mechanisms. Informal comment periods, if used, shall have a minimum duration of fifteen (15)</p>	
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	<p>calendar days. Information gathered from informal comment forms shall be publicly posted and, while drafting teams are not required to provide a written response to each individual comment received, drafting teams must post a summary response that identifies how it used comments submitted by stakeholders. The intent is to gather stakeholder feedback on a “working document” before the document reaches the point where it is considered the “final draft.”</p> <p>The FRCC Standards and Registration staff shall conduct a quality review of the new or modified standard, its associated VRFs and VSLs, and implementation plan prior to each posting.</p> <p>Step 5c - The initial formal comment period, and if necessary subsequent formal comment periods, shall be for at least thirty (30) calendar day duration and shall start after the SDT has posted its consideration of stakeholder comments and any conforming changes to the associated standard.</p> <p>The intent of the formal comment periods is to solicit very specific feedback on the final draft of the standard, VRFs, VSLs, and implementation plan. If stakeholders disagree with some aspect of the proposed set of products, comments provided should suggest specific language that would make the product acceptable to the stakeholder.</p> <p>Notice of the posting will go out to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator to seek comments.</p>	
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	<p>Comments shall be submitted (via email) to the FRCC Standards and Registration staff (FRCCStandard@frcc.com). All comments are due by the close of business on the posted due date. If the comment due date falls on a weekend or nationally recognized holiday, the comments shall be due by the close of business on the next regularly scheduled business day.</p>	
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Section 3.4.8 Step 8 Initial – Ballot of the new or revised FRCC Regional Reliability Standard and Non-Binding Poll of VRFs and VSLs

<p>The FRCC Standards Process Manager will post the final draft of the standard on the FRCC website at least fifteen (15) calendar days before a ballot can begin. The Ballot Pool shall have a minimum of ten (10) calendar days to vote on a standard. The Ballot Pool may vote to approve or not approve the standard. If approved, the FRCC Standards Process Manager will submit the FRCC Regional Reliability Standard, proposed implementation plan, and any supporting documents to the FRCC Board of Directors for adoption.</p> <p>If approval by the Ballot Pool is not obtained, the PC and/or OC will determine if the draft standard is to be sent back to the standard drafting team to repeat step 6 to incorporate any comments, or to take no further action.</p> <p>If no further action is taken, the reason for such will be posted on the FRCC public website. A notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.</p>	<p>The FRCC Standards and Registration staff shall announce the opening of the initial ballot window and the non-binding poll of VRFs and VSLs. The ballot window and non-binding poll window shall both take place during the last ten (10) calendar days of the thirty (30) calendar day formal comment period. This allows all stakeholders the opportunity to comment on the final draft of each proposed standard, even those stakeholders who are not members of the Ballot Pool.</p> <p>The ballot and non-binding poll shall be conducted electronically. The voting and polling windows shall each be a period of ten (10) calendar days but both shall be extended, if needed, until a quorum is achieved. During a ballot window, FRCC shall not sponsor or facilitate public discussion of the standard action under ballot.</p> <p>The SDT shall consider every stakeholder comment submitted either in response to a formal comment period or submitted with a ballot that includes a proposal for a specific modification to the standard or its implementation plan posted for comment and approval. The SDT shall be responsive to all comments by providing a written response and indicating whether the drafting team adopted or rejected any recommendations.</p>	<p>Updated process language to incorporate the use of ‘concurrent posting periods’ (i.e., Comment period, ballot pool formation and initial ballot during the same timeframe). Introduced the concept of non-binding polls of VRFs and VSLs. Clarified SDT and FRCC Standards and Registration staff responsibilities associated with comment responses and initial/additional ballot results.</p>
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	<p>If stakeholders submit comments that indicate a specific improvement to one or more of the VRFs or VSLs and the modification would improve consensus without violating the criteria for setting VRFs and VSLs, then the SDT, working with FRCC Standards and Registration staff, shall consider and respond to each comment, and shall make conforming changes to reflect those comments. There is no requirement to conduct a new non-binding poll of the revised VRFs and VSLs if no changes were made to the associated standard; however, if the requirements are modified and conforming changes are made to the associated VRFs and VSLs, another non-binding poll of the revised VRFs and VSLs shall be conducted.</p> <p>All comments submitted and the responses to those comments shall be publicly posted.</p> <p>See Attachment C <i>Development of and Voting of the Registered Ballot Body</i> for ballot approval and quorum requirements.</p> <p>If a stakeholder or balloter proposes a significant revision to the standard during the formal comment period or concurrent initial ballot that will improve the quality, clarity, or enforceability of that standard then the SDT shall make such revisions and post the revised standard (that has been significantly changed from the previous ballot) for another public comment period and an additional ballot.</p> <p>The SDT shall address comments submitted during additional ballot periods (comments submitted from stakeholders during the open formal comment period and comments submitted with negative ballots) in the same manner as for the Initial Ballot. Once the SDT has a draft standard that has been</p>	
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	<p>through an “additional ballot” and the team believes that no additional significant modifications are needed, or the SDT has reached a point where it has made a good faith effort at resolving applicable objections, the standard shall be posted for a Final Ballot.</p>	
<p>Section 3.4.9 Step 9 - Final Ballot - of the New or Revised FRCC Regional Reliability Standard</p>		
	<p>In the Final Ballot, members of the ballot pool shall again be presented the proposed standard (that has not been significantly changed from the previous ballot) along with the reasons for negative votes, the responses, and any resolution of the differences. An insignificant revision is a revision that does not change the scope, applicability, or intent of any requirement and includes but is not limited to things such as correcting the numbering of a requirement, correcting the spelling of a word, adding an obviously missing word, or rephrasing a requirement for improved clarity. Where there is a question as to whether a proposed modification is “substantive” the FRCC RECCF shall make the final determination. There is no formal comment period concurrent with the Final Ballot and no obligation for the SDT to respond to any comments submitted during the Final Ballot.</p> <p>All members of the Ballot Pool shall be permitted to reconsider and change their vote from the prior ballot. Members of the Ballot Pool who did not respond to the prior ballot shall be permitted to vote in the Final Ballot. In the Final Ballot, votes shall be counted by exception only. Members of the ballot pool for the Final Ballot may indicate a revision to their original vote otherwise their vote shall remain the same as in their prior ballot.</p> <p>There are no limits to the number of “additional” public comment periods and ballots that can be</p>	<p>Updated process language to clarify and include a process step defining the final ballot requirements. Updated language to reflect the involvement and responsibilities of the RECCF. Guidance is provided to members of the ‘ballot pool’ on the conduct of the final ballot.</p>

	<p>conducted to result in a standard that is clear and enforceable, and achieves a quorum and sufficient affirmative votes for approval. The FRCC RECCF has the authority to conclude this process or a particular standards action if it becomes obvious that the SDT cannot develop a standard that is within the scope of the associated SAR, is sufficiently clear to be enforceable, and achieves the requisite weighted segment approval percentage. The FRCC Standards and Registration staff shall post the final outcome of the ballot process. If the standard is approved, the consensus standard shall be posted and presented to the Board of Directors for adoption by the FRCC.</p>	
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Section 3.4.10 Step 10 – Adoption of FRCC Regional Reliability Standards and Implementation Plans by the FRCC Board of Directors

<p>At a regular or special meeting, the FRCC Board of Directors may consider adoption of the proposed FRCC Regional Reliability Standard that has been approved by the RBB Ballot Pool. A FRCC Regional Reliability Standard submitted for adoption by the FRCC Board of Directors must be posted for notification and comment on the FRCC public website at least ten (10) calendar days prior to action by the FRCC Board of Directors. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator. The FRCC Board of Directors shall consider the comments received, the responses provided, and any dissenting opinions. The FRCC Board of Directors shall adopt or reject a FRCC Regional Reliability Standard as submitted, but may not modify the proposed FRCC Regional Reliability Standard. If the FRCC Board of Directors chooses not to adopt a FRCC Regional Reliability Standard, it shall provide its reasons for not doing so.</p>	<p>At a regular or special meeting, the FRCC Board of Directors may consider adoption of the proposed FRCC Regional Reliability Standard and the associated implementation plan that have been approved by the Registered Ballot Pool. A FRCC Regional Reliability Standard and the associated implementation plan submitted for adoption by the FRCC Board of Directors must be posted for notification and comment on the FRCC public website at least ten (10) calendar days prior to action by the FRCC Board of Directors. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator. The FRCC Board of Directors shall consider the comments received, the responses provided, and any dissenting opinions. The FRCC Board of Directors shall adopt or reject a FRCC Regional Reliability Standard and the associated implementation plan as submitted, but may not modify the proposed FRCC Regional Reliability Standard. If the FRCC Board</p>	<p>Updated process language to clarify FRCC Board of Directors responsibilities associated with the adoption of a FRCC Regional Reliability Standard, VRFs, VSLs and associated implementation plans. Provided guidance to the FRCC Board of Directors on the approval of VRFs and VSLs. Further clarified FRCC Standards and Registration staff responsibilities.</p>
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<p>If the FRCC Board of Directors chooses not to adopt the proposed FRCC Regional Reliability Standard, the reason for such decision will be posted on the FRCC public website. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.</p>	<p>of Directors chooses not to adopt a FRCC Regional Reliability Standard, it shall provide its reasons for such decision and the decision will be posted on the FRCC public website. Notice of the posting will be sent to (1) the Registered Ballot Body, (2) the FRCC standing committees, subcommittees and working groups, (3) the Florida Public Service Commission, and (4) the SERC Southern Sub-Region Reliability Coordinator.</p> <p>The board shall consider approval of the VRFs and VSLs associated with a Reliability Standard. In making its determination, the board shall consider the following:</p> <p>FRCC Standards and Registration staff shall present the results of the non-binding poll conducted and a summary of industry comments received on the final posting of the proposed VRFs and VSLs. FRCC Standards and Registration staff shall present a set of recommended VRFs and VSLs that considers the views of the SDT, stakeholder comments received on the draft VRFs and VSLs during the posting for comment process, the non-binding poll results, appropriate governmental agency rules and directives, and VRF and VSL assignments for other Reliability Standards to ensure consistency and relevance across the entire spectrum of Reliability Standards.</p>	
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Section 3.5.2 Regional Definition Development

	<p>NERC maintains a glossary of approved terms, entitled the “Glossary of Terms Used in NERC Reliability Standards.” The glossary includes terms that have been through the formal approval process and are used in one or more NERC Reliability Standards. There are two sections to the glossary. The first section includes definitions for terms used in continent-wide standards, and the second section</p>	<p>Section was added to establish a process for the development of defined terms that are used in FRCC Regional Reliability Standards. Provided language to reflect the involvement of the RECCF. Provided additional clarifying verbiage on the RECCF responsibilities associated with definition development.</p>
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	<p>includes definitions for terms used in Regional standards that have been adopted by the NERC Board of Trustees. The Glossary of Terms is intended to provide consistency throughout the Reliability Standards.</p> <p>There are several methods that can be used to add, modify or retire a defined term used in a FRCC Regional Reliability Standard.</p> <p>Anyone can use a SAR to submit a request to add, modify, or retire a defined term. A drafting team may propose to add, modify, or retire a defined term in conjunction with the work it is already performing.</p> <p>The following considerations should be made when considering proposals for new or revised definitions:</p> <p>Regional Entities have defined terms that have been approved for use in Regional Reliability Standards, and where the drafting team agrees with a term already defined by another Region, the same definition should be adopted if needed to support an FRCC Regional Reliability Standard.</p> <p>If a term is used in a reliability standard according to its common meaning (as found in a collegiate dictionary), the term shall not be proposed for addition to the <i>Glossary of Terms Used in NERC Reliability Standards</i>.</p> <p>If a term has already been defined, any proposal to modify or delete that term shall consider all uses of the definition in approved standards, with a goal of determining whether the proposed modification is acceptable, and whether the proposed modification would change the scope or intent of any approved standards.</p>	
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	<p>When practical, where the North American Energy Standards Board (NAESB) has a definition for a term, the drafting team shall use the same definition to support a NERC standard.</p> <p>Any definition that is balloted separately from a proposed new or modified standard or from a proposal for retirement of a standard shall be accompanied by an implementation plan.</p> <p>If a SAR is submitted to the FRCC Standards and Registration staff with a proposal for a new or revised definition, the FRCC RECCF shall consider the urgency of developing the new or revised definition and may direct FRCC Standards and Registration staff to post the SAR immediately, or may defer posting the SAR until a later time based on its priority relative to other projects already underway or already approved for future development. If the SAR identifies a term that is used in a standard already under revision by a drafting team, the FRCC RECCF may direct the drafting team to add the term to the scope of the existing project. Any proposal for a new or revised definition shall be processed in accordance with Section III. <i>Steps in Developing a FRCC Regional Reliability Standard</i> of this procedure.</p>	
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Section 3.6.1 Requests to Revise the FRCC Regional Reliability Standard Development Process		
<p>Any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, or any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System may submit a written request to modify the <i>FRCC Regional Reliability Standard Development Process Manual</i>. The FRCC Standards Process Manager shall oversee the handling of the request. The FRCC OC and/or the PC shall review the request and submit</p>	<p>Any member of the FRCC, or group (i.e. committee, subcommittee, working group or task force) within the FRCC, or any entity that is directly and materially affected by the reliability of the FRCC Bulk Power System may submit a written request to modify the <i>FRCC Regional Reliability Standard Development Process Manual</i>. The FRCC Standards and Registration staff shall oversee the handling of the request. The FRCC Standards and Registration staff shall prioritize all requests, merge</p>	<p>Section was significantly expanded to provide clarifying verbiage in regards to process requirements and the role and responsibility of the FRCC Standards and Registration staff.</p>

<p>recommendations to the FRCC Board of Directors for consideration. The FRCC Board of Directors, on its own motion, may amend the FRCC Regional Reliability Standard Process.</p>	<p>related requests, and respond to each requestor within thirty (30) calendar days.</p> <p>The FRCC Standards and Registration staff shall post the proposed revisions for a thirty (30) calendar day formal comment period. Based on the degree of consensus for the revisions, the FRCC Standards and Registration staff shall:</p> <p>Submit the revised process or processes for Ballot Pool approval; Repeat the posting for additional inputs after making changes based on comments received; Remand the proposal to the requestor or for further work; or Reject the proposal.</p> <p>The Registered Ballot Body shall be represented by a Ballot Pool. The ballot procedure shall be the same as that defined for approval of a FRCC Regional Reliability Standard, including the use of subsequent ballots (additional or Final Ballots), as necessary. If the proposed revision is approved by the Ballot Pool, the FRCC Standards and Registration staff shall submit the revised procedure to the FRCC Board of Directors for adoption. The FRCC Standards and Registration staff shall submit to the board a description of the basis for the changes, a summary of the comments received, and any minority views expressed in the comment and ballot process. The proposed revisions shall not be effective until approved by the NERC Board of Trustees and applicable governmental authorities.</p>	
<p>Section 3.6.2 Five-Year Review</p>		
<p>Each FRCC Regional Reliability Standard shall be reviewed at least once every five (5) years. The review date will be determined from the effective date or the latest revision date whichever is later.</p>	<p>Each FRCC Regional Reliability Standard developed through <i>FRCC Regional Reliability Standard Development Process</i> shall be reviewed at</p>	<p>Section was significantly expanded to provide clarifying verbiage in regards to process requirements. Specifically established the ‘review team’ for FRCC Regional Reliability Standards</p>

The review process shall be conducted in accordance with *Steps 1 through 10 of the FRCC Regional Reliability Standard Development Process Manual*. As a result of this review, a FRCC Regional Reliability Standard shall be reaffirmed, revised, or withdrawn.

least once every five years from the effective date of the standard.

If a FRCC Regional Reliability Standard is nearing its five-year review and has issues that need resolution, then a FRCC Regional Reliability Standard Development project will be initiated for the complete review and associated revision of that standard that includes addressing all outstanding governmental directives and all unresolved issues identified by stakeholders. The standard development project will be processed in accordance with Section III. *Steps in Developing a FRCC Regional Reliability Standard* of this procedure.

If a FRCC Regional Reliability Standard is nearing its five-year review and there are no outstanding governmental directives or unresolved stakeholder issues associated with that standard, then a FRCC Regional Reliability Standard Development project will be initiated solely for the “five-year review” of that standard and will be addressed by the following process.

For a project that is focused solely on the five-year review, the FRCC RECCF shall appoint a review team of subject matter experts to review the FRCC Regional Reliability Standard and recommend whether the standard should be reaffirmed, revised, or withdrawn. Each review team shall post its recommendations for a thirty (30) calendar day formal stakeholder comment period and shall provide those stakeholder comments to the FRCC RECCF for consideration.

If a review team recommends reaffirming a FRCC Regional Reliability Standard, the FRCC RECCF

where there are no outstanding governmental directives or unresolved stakeholder issues associated with that standard, to conduct a review and the associated process to following under these circumstances.

	<p>shall submit the reaffirmation to the FRCC Board of Directors for concurrence. Reaffirmation does not require approval by stakeholder ballot.</p> <p>If a review team recommends modifying or withdrawing a FRCC Regional Reliability Standard, the team shall develop a SAR with such a proposal and the SAR shall be submitted to the FRCC RECCF for acceptance as a new project. Each existing standard recommended for modification or withdrawal shall remain in effect in accordance with the associated implementation plan until the action to modify or withdraw the standard is approved by its ballot pool, adopted by the FRCC Board of Directors, and approved by applicable governmental authorities.</p> <p>In the case of reaffirmation of a FRCC Regional Reliability Standard, the standard shall remain in effect pending the results of the next five-year review or until the standard is otherwise modified or withdrawn by a separate action.</p>	
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