

December 20, 2013

**VIA ELECTRONIC FILING**

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**Re: North American Electric Reliability Corporation  
Docket No. RR13-\_\_ -000  
Petition for Approval of Proposed Revisions to the  
Southwest Power Pool Regional Entity Standards Development Process Manual**

Dear Ms. Bose:

The North American Electric Reliability Corporation (NERC) hereby submits the "Petition of the North American Electric Reliability Corporation for Approval of Proposed Revisions to the Southwest Power Pool Regional Entity Standards Development Process Manual." This petition seeks approval of proposed amendments to the Southwest Power Pool Regional Entity Standards Development Process Manual as a "Regional Entity Rule."

This filing consists of: (1) this transmittal letter, (2) the narrative text of the filing, which follows this transmittal letter, and (3) Attachments 1 and 2 the narrative. All of these documents are transmitted in a single pdf file.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Owen E. MacBride  
Owen E. MacBride

Attorney for North American Electric  
Reliability Corporation

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**UNITED STATES OF AMERICA**  
**Before the**  
**FEDERAL ENERGY REGULATORY COMMISSION**

**NORTH AMERICAN ELECTRIC** )  
**RELIABILITY CORPORATION** )      **Docket No. RR13-\_\_-000**

**PETITION OF THE**  
**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION**  
**FOR APPROVAL OF PROPOSED REVISIONS TO THE**  
**SOUTHWEST POWER POOL REGIONAL ENTITY**  
**STANDARDS DEVELOPMENT PROCESS MANUAL**

Gerald W. Cauley  
President and Chief Executive Officer  
North American Electric Reliability  
Corporation  
3353 Peachtree Road NE  
Suite 600, North Tower  
Atlanta, GA 30326  
(404) 446-2560  
(404) 446-9765 – facsimile

Owen E. MacBride  
Schiff Hardin LLP  
233 South Wacker Drive, Suite 6600  
Chicago, IL 60606  
(312) 258-5680  
(312) 258-5700 – facsimile  
[omacbride@schiffhardin.com](mailto:omacbride@schiffhardin.com)

Charles A. Berardesco  
Senior Vice President and General Counsel  
Holly A. Hawkins  
Assistant General Counsel (Standards)  
North American Electric Reliability  
Corporation  
1325 G Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 400-3000  
(202) 644-8099 – facsimile  
[charles.berardesco@nerc.net](mailto:charles.berardesco@nerc.net)  
[holly.hawkins@nerc.net](mailto:holly.hawkins@nerc.net)

December 20, 2013

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## TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	NOTICES AND COMMUNICATIONS	2
III.	BASIS AND PURPOSE OF THE PROPOSED AMENDMENTS TO THE SPP RE STANDARDS DEVELOPMENT PROCESS MANUAL	2
A.	Section I – Introduction	4
B.	Section II – Background	4
C.	Section III – Regional Reliability Standard Definition, Characteristics And Elements	5
D.	Section IV – Roles in the SPP RE Regional Reliability Standards Development Process	5
E.	Section V – SPP RE Regional Reliability Standards Development Process	6
1.	Subsection A – Assumptions and Prerequisites	7
2.	Subsection B – SPP RE Regional Reliability Standards Development Process Steps	7
3.	Subsection C – Filing of Regional Reliability Standards with Regulatory Agencies	14
F.	Appendix A	14
G.	Appendix B: SPP RE Regional Standard Request Form	15
H.	Appendix C: SPP RE Regional Standard Request Comment Form	15
I.	Appendix D: SPP RE Regional Reliability Standards Development Procedure	15
IV.	APPROVAL PROCESS FOR THE AMENDMENTS	15
V.	CONCLUSION	16
	<b>Attachment 1:</b> Amended Southwest Power Pool Regional Entity Standards Development Process Manual – Clean version	
	<b>Attachment 2:</b> Amended Southwest Power Pool Regional Entity Standard Development Process Manual – Redlined version	

## **I. INTRODUCTION**

In accordance with 18 C.F.R. §§39.8 and 39.10, the North American Electric Reliability Corporation (“NERC”) requests the Commission’s approval of amendments to the Standards Development Process Manual (the “SPP RE Manual”) of Southwest Power Pool Regional Entity (“SPP RE”), which is contained in Exhibit C to the Amended and Restated Delegation Agreement between NERC and SPP RE (“SPP RE Delegation Agreement”), as amendments to a “Regional Entity Rule.” SPP RE is one of the Regional Entities to which NERC has delegated certain statutory functions under §215 of the Federal Power Act, pursuant to the SPP RE Delegation Agreement.<sup>1</sup>

**Attachment 1** to this filing is a “clean” version of the SPP RE Manual incorporating the proposed amendments. **Attachment 2** is a redlined version of the SPP RE Manual, marked to show the proposed amendments. **Attachment 2** is redlined against the currently effective SPP RE Manual, Version 0, effective October 2, 2007.

By approving the proposed amendments to the SPP RE Manual included in this filing, the Commission will also be approving the amendments for purposes of Exhibit C to the SPP RE Delegation Agreement.

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<sup>1</sup> The complete currently effective SPP RE Delegation Agreement is available at: [http://www.nerc.com/FilingsOrders/us/Regional%20Delegation%20Agreements%20DL/SPP-RE\\_RDA\\_Effective\\_20130924.pdf](http://www.nerc.com/FilingsOrders/us/Regional%20Delegation%20Agreements%20DL/SPP-RE_RDA_Effective_20130924.pdf). Upon approval by the Commission of the amended SPP Manual, the amended Manual will be inserted into Exhibit C of the posted version of the SPP Delegation Agreement to replace the Version 0 SPP Manual.

## **II. NOTICES AND COMMUNICATIONS**

Notices and communications with respect to this filing may be addressed to:

Gerald W. Cauley  
President and Chief Executive Officer  
North American Electric Reliability  
Corporation  
3353 Peachtree Road NE  
Suite 600, North Tower  
Atlanta, GA 30326  
(404) 446-2560  
(404) 446-9765 – facsimile

Owen E. MacBride\*  
Schiff Hardin LLP  
233 South Wacker Drive, Suite 6600  
Chicago, IL 60606  
(312) 258-5680  
(312) 258-5700 – facsimile  
[omacbride@schiffhardin.com](mailto:omacbride@schiffhardin.com)

Charles A. Berardesco\*  
Senior Vice President and General Counsel  
Holly A. Hawkins\*  
Assistant General Counsel (Standards)  
North American Electric Reliability Corporation  
1325 G Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 400-3000  
(202) 644-8099 – facsimile  
[charles.berardesco@nerc.net](mailto:charles.berardesco@nerc.net)  
[holly.hawkins@nerc.net](mailto:holly.hawkins@nerc.net)

\* Persons to be included on the Commission’s official service list. NERC requests waiver of the limitation to two persons on the service list, in order to include a third person.

## **III. BASIS AND PURPOSE OF THE PROPOSED AMENDMENTS TO THE SPP RE STANDARDS DEVELOPMENT PROCESS MANUAL**

Section 39.10(a) of the Commission’s regulations states, in pertinent part:

A Regional Entity shall submit a Regional Entity Rule or Rule change to the Electric Reliability Organization and, if approved by the Electric Reliability Organization, the Electric Reliability Organization shall file the proposed Regional Entity Rule or Rule change with the Commission for approval. Any filing by the Electric Reliability Organization shall be accompanied by an explanation of the basis and purpose for the Rule or Rule change, together with a description of the proceedings conducted by the Electric Reliability Organization or Regional Entity to develop the proposal.

Section 39.1 of the Commission’s regulations defines “Regional Entity Rule” for purposes of Part 39 as “the bylaws, a rule of procedure or other organizational rule or protocol of a Regional Entity.” Therefore, proposed amendments to a Regional Entity’s standards development process manual are subject to the requirements of §39.10. This section of this filing describes the basis and purpose for the proposed amendments to the SPP RE Manual. Section IV of this filing

describes the proceedings conducted by SPP RE and NERC resulting in approval of the proposed amendments.

As noted earlier, the currently effective version of the SPP RE Manual is Version 0 effective October 2, 2007, which was approved by the Commission as part of its original approval of delegation agreements between NERC and the Regional Entities. The proposed amendments to the SPP RE Manual include numerous improvements and other revisions to the SPP RE Regional Reliability Standards Development Process. The proposed amendments include:

- Added a provision allowing the SPP Markets and Operations Policy Committee (“MOPC”) to take one of three actions following the submittal of a request to develop, revise, or retire an SPP RE Regional Reliability Standard.
- Clarified the formation of a standard drafting team (“SDT”) following a request for a new SPP RE Regional Reliability Standard, including a provision allowing for an open nomination process when selecting individuals to serve on the SDT.
- Incorporated language to ensure each written comment is considered and responded to by the SDT during the public comment period and open voting process.
- Revised the open voting process on proposed SPP RE Regional Reliability Standards to include:
  - A notifications process to ensure the posting of a proposed Regional Reliability Standard on the public SPP website as well as through customary communications procedures and processes then in effect.
  - Incorporated detailed qualification guidelines for entities registering within one of the five SPP voting segments.
  - Modified the “End User and Public Interest” voting segment to exclude individuals currently employed by an entity eligible to join one or more of the voting segments.
  - Established a quorum requirement of 75 percent of the members of the registered ballot body casting a ballot.
  - Adjusted the weighting formula to proportionally reduce voting segments with less than five votes to ensure no segment is unduly influential in the balloting process.
  - Added a provision for a recirculation ballot to allow entities the opportunity to revise their voting position in consideration of comments submitted by other entities.

- Incorporated a provision in the development of Minority Reports to require a summary of comments and/or issues not addressed by the SDT during the development of a proposed SPP RE Regional Reliability Standard.
- Included language specifying action(s) required of the MOPC in the event further revision to a proposed standard is warranted, as well as language specifying the materials to be provided to the MOPC for consideration and review.
- Included language throughout the SPP RE Manual requiring entities to be within the SPP RE or SPP Regional Transmission Organization (“RTO”) region to participate in the SPP RE standards development process (in Version 0, participation requires that an entity hav[e] a direct and material interest in the SPP RE or SPP RTO Bulk Electric System).
- Added language that entities registered in multiple regions will not be able to register on behalf of more than one regional registration.
- Defined customary communications processes to be used to notify stakeholders of SPP RE Regional Reliability Standards under development.
- Clarified when ballot body registration and voting begins and ends.

The following subsections of this filing summarize the amendments to the SPP RE Manual on a section-by-section basis:

**A. Section I - Introduction**

Section I, Introduction, is amended to provide that any entity within the SPP RE or SPP RTO has a right to participate in the SPP RE Regional Reliability Standards Development Process.<sup>2</sup> Other amendments to the Introduction are for the purpose of implementing common terminology, acronyms and capitalization conventions. Such revisions in this section and throughout the SPP RE Manual include consistent use of the term “Regional Reliability Standard,” the term and acronym Bulk Electric System (“BES”) rather than Bulk Power System, and other acronyms such as “SDT” for Standards Development Team.

**B. Section II - Background**

Section II, Background, is amended for the purpose of implementing common

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<sup>2</sup> The stated elements of participation, which are not being amended, include the right to (a) express a position and its basis, (b) have that position considered, (c) vote on a proposed Regional Reliability Standard through a segment weighted balanced process, and (d) appeal.

terminology, acronyms and capitalization conventions.

**C. Section III - Regional Reliability Standard Definition, Characteristics, and Elements**

Section III, Regional Reliability Standard Definition, Characteristics, and Elements is comprised of subsections A, B, C and D.

Subsection A, Definition of a Regional Reliability Standard, is amended for the purpose of implementing common terminology, acronyms and capitalization conventions. In addition, the adjective “continent-wide” is deleted from references to NERC Reliability Standards. Further, the last sentence of the subsection is revised to state that SPP RE Regional Reliability Standards that are approved by the SPP RE Trustees “are forwarded to NERC for review and approval . . .” before submission to the Commission for approval.

Subsection B, Definition of SPP Criteria, is amended for the purpose of implementing common terminology, acronyms and capitalization conventions and minor non-substantive textual changes.

Subsection C, Characteristics of a Regional Reliability Standard, is amended for the purpose of implementing common terminology, acronyms and capitalization conventions.

Subsection D, Elements of a Regional Reliability Standard, is amended for the purpose of implementing common terminology, acronyms and capitalization conventions and minor non-substantive textual changes. This subsection sets forth the “Performance Elements of a Regional Reliability Standard.”

**D. Section IV - Roles in the SPP RE Regional Reliability Standards Development Process**

In Section IV, Roles in the SPP RE Regional Reliability Standards Development Process, the statement of who is allowed to request that a SPP RE Regional Reliability Standard be developed, modified or “retired” (in the Version 0, “withdrawn” or “deleted”) is changed in



several places to: “any entity within the SPP RE or SPP RTO region.” In Version 0, the description of such entities is: “Any member of NERC (including any member of a regional reliability organization, regional entity, or group within NERC)” and “any entity (person, organization, company, government agency, individual, etc.) who is directly and materially affected by the reliability of the North American BES.” This text in Version 0 has been deleted. This revision is intended to clarify that any entity within the SPP RE or SPP RTO Region is entitled to participate in the SPP RE Regional Reliability Standards Development Process.

The description of the role of the SPP MOPC is amended to state that “If accepted in Step 1,” the MOPC will assign a standards request to a SDT for development, revision or retirement of the Regional Reliability Standard.

The description of the role of the SDT is amended to provide that an SDT is comprised of “technical experts that work cooperatively in the development and modification of SPP RE Regional Reliability Standards in accordance with the processes defined in this Manual.” This role description is also amended to provide that any interested party may “participate in” (rather than just “attend”) meetings of the SDT; however, “only SDT members may vote on SDT actions and decisions outside of the open voting process” in Step 6.

Other amendments to Section IV are made for the purpose of implementing common terminology, acronyms and capitalization conventions and minor non-substantive textual changes.

#### **E. Section V - SPP RE Regional Reliability Standards Development Process**

Section V, SPP RE Regional Reliability Standards Development Process, contains three subsections and sets forth a total of 13 process steps for the SPP RE Standards Development Process. Amendments are made throughout this section to implement common terminology,

acronyms and capitalization conventions and minor non-substantive textual changes.

**1. Subsection A - Assumptions and Prerequisites**

Subsection A, Assumptions and Prerequisites, is amended consistent with earlier sections described above to describe the entities having a right to participate as “Any entity representing an organization in the SPP RE or SPP RTO region.” “Right to participate” includes expressing an opinion and its basis, having that position considered, voting on a proposed SPP RE Regional Reliability Standard through a segment weighted balanced process, and appealing any negative decision. This subsection is also amended to state that participation is not conditioned on membership in SPP or registration with SPP RE. Additionally, this subsection is amended to state that meetings of SDTs will be noticed on the public SPP website at least seven days (15 days in Version 0) in advance. Finally, the following provision is added in subsection A:

SPP RE staff will communicate about SPP RE Regional Reliability Standards under development using the customary communications procedures and processes then in place, including but not limited to: posting documents to the public SPP website, publishing newsletter articles, making announcements at SPP organizational group meetings, and sending notifications to SPP public email exploder lists such as the MOPC, Board of Directors, RE Trustees, and RE Standards Development lists. Interested parties may subscribe to public exploder lists via the SPP public website or by contacting the SPP customer relations department.

**2. Subsection B - SPP RE Regional Reliability Standards Development Process Steps**

Subsection B, SPP RE Regional Reliability Standards Development Process Steps, sets forth the 13 process steps. A sentence is added at the start of this subsection to explicitly state that the process steps apply to developing, revising, or retiring an SPP RE Regional Reliability Standard.

Step 1 – Request to Develop, Revise or Retire [“Delete” in Version 0] a SPP RE Regional Reliability Standard, is amended consistent with earlier sections described above to

describe the entities having a right to participate as “Any entity within the geographical footprint of SPP RE or SPP RTO.” In addition, the following provisions are added to Step 1:

Following the development of a request, the MOPC may take one of the following actions:

- Remand the request back to the Originator for additional work and information.
- Accept the request as a candidate for a new or revised regional standard.
- Reject the request. If the MOPC rejects a request, it will provide a written explanation for rejection to the Originator and the RE Trustees within 30 days of the rejection decision.

If rejected by MOPC, the RE Trustees may accept MOPC’s decision or move it forward for consideration (Step 2).

In Step 2 – Notification to Regional Entity Trustees & Public Notice, the following text is added at the start of the section before the description of the actions pursuant to this step: “Once accepted as a candidate for a new or revised SPP RE Regional Reliability Standard . . . .” This Step is also amended to state that SPP RE Staff will publicize the request utilizing “any customary communications procedures then in effect.”

A new Step 3 – Standard Drafting Team Formation, is added, containing text formally in Step 2 plus new text. The following text is added setting forth the process for identifying and selecting members for the SDT:

For each new SPP RE Regional Reliability Standard request, MOPC will use the customary communication procedures and processes then in effect to request that interested parties who wish to serve on the SDT submit their names and qualifications to MOPC. The request will also be posted on the public SPP website. MOPC will establish a 30-day window for submittal of nominations. MOPC will then appoint to the SDT individuals with the necessary technical expertise. SDT membership shall not be conditioned upon membership in SPP or registration with SPP RE. If the open nominations process does not solicit enough SDT members, MOPC may assign the request to an existing working group.

This provision replaces the following provision in Step 2 in Version 0: “The MOPC will assign the drafting and scoping responsibility to an appropriate SPP Working Group or Task Force. This group will become the Standard Drafting Team (SDT) for this particular Standard request.”

Additionally, text in Step 2 of Version 0 that is now included in new Step 3 is amended to state that, while meetings of the SDT are open to any interested party, “only SDT members may vote on SDT actions and decisions outside of the open voting process” in Step 6.

In Step 4 – Scoping and Drafting (Step 3 in Version 0), text is added to specify that the actions recommended by the SDT may include “termination of the proposed SPP RE Regional Reliability Standard.” Similarly, in the fifth paragraph of this step, concerning regular reporting by the SDT to the SPP RE Trustees, text is added to specify that the SDT may request consideration of termination of the proposed Regional Reliability Standard.

In Step 5 – Post Draft for 30 day Public Comments (Step 4 in Version 0), text is added (consistent with similar changes described above) to state that SPP RE staff will inform Registered Entities and other potentially interested stakeholders “using the customary communications procedures and processes then in effect.” This Step is also amended to specify that within 30 days after the conclusion of the 30-day comment period, the SDT shall convene and “consider the written views and objections of all participants as they relate” to the draft proposed Regional Reliability Standard. The SDT shall also “prepare a summary” of the comments received and any changes made as a result of the comments. Text is also added to require that “the summary, along with a response to each comment received, will be posted on the SPP website no later than the next posting of the proposed standard.” Finally, as in Version 0, the SDT may elect to return to the previous step, Scoping and Drafting, but only “following [the SDT’s] consideration of comments.”

Step 6 – Open Voting (Step 5 in Version 0) is amended to state that at the time of balloting on the proposed Regional Reliability Standard, the documents to be posted shall include “but not [be] limited to” the implementation plan, supporting technical documentation, and summary of comments. The text of this Step is also amended to provide greater specificity as to when registration for the ballot body for the first ballot shall commence (15 days prior to the start of the 15-day voting period); to specify that votes must be submitted by close of business on the final day of the voting period; and to provide, in the following new text, greater specificity as to the composition of the ballot body for voting on the proposed Regional Reliability Standard:

Entities within the SPP RE or SPP RTO region may participate in the voting process. To vote on a proposed SPP RE Regional Reliability Standard, an entity must register in a ballot body created for that specific draft of the proposed SPP RE Regional Reliability Standard. Registration must be submitted by close of business on the final day of the ballot body registration period. The registered ballot body comprises all entities or individuals that qualify for one of the SPP RE Regional Reliability Standard segments and are registered with SPP RE as a ballot body participant. A registered ballot body participant cannot change segments during a balloting period once the participant has cast a vote or designated a proxy. When registering for a subsequent ballot(s) of the same proposed SPP RE Regional Reliability Standard, an entity cannot change the segment for which it previously registered.

This Step maintains the following five voting segments for Regional Reliability Standards in Version 0: (1) Transmission, (2) Generation, (3) Marketer/Broker, (4) Distribution/Load Serving Entity, (5) End User and Public Interest. However, for each of the five voting segments, extensive, detailed qualifications are added describing entities that are included in the voting segment, with the proviso that “only one of the segment qualifications

must be met.<sup>3</sup> The qualifications for the End User and Public Interest voting segment include this provision:

Any entity within the SPP RE or SPP RTO region that qualifies for registration in another segment may not register in the End User/Public Interest segment. Any individual currently employed by an entity that is eligible to join one or more of the other segments shall not be qualified to join the End User/Public Interest segment.

The following text is also added, prior to the detailed listing of the voting segment qualifications:

Any entity that can meet any one of the segment qualifications below is entitled to register and vote in that segment. Only one vote per entity per segment is permitted. For purposes of SPP RE Regional Reliability Standard ballot body registration and voting, an entity is defined as an individual or organization that has a separate legal identity. Affiliates (subsidiary, parent, or sibling corporations) shall be treated as one entity except in instances where the affiliates are separately registered in the NERC Compliance Registry, in which case the affiliates may be treated as separate entities. Entities registered in multiple regions will not be able to register on behalf of more than one regional registration.

This Step is also amended to provide that “Each voting segment will receive 20% of the vote, unless there are less than five votes in the segment and then the segment vote will be adjusted as provided for below,” referring to new text captioned “Criteria for Ballot Pool Approval.” The text under “Criteria for Ballot Pool Approval” sets forth the requirements for a Regional Reliability Standard action to be approved by the ballot body and passed on for further consideration in Step 8:

- A quorum of registered ballot body members, which is established by at least 75% of the members of the registered ballot body casting a ballot, whether that ballot is affirmative, negative, or an abstention. A quorum is not reached when 75% of the registered ballot body is equal to or less than three; and

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<sup>3</sup> The extensive, newly added voting segment qualifications are not stated here, but are shown in the redlined version of the amended SPP RE Manual provided in **Attachment 2**.

- A two-thirds (66.67%) 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.

This new text then provides detailed criteria for determining if there are sufficient affirmative votes for ballot body approval, including the treatment of voting in segments with five or more votes and segments with less than five votes. If a standard receives the required two-thirds majority but also receives negative votes with comments during the ballot, those comments are to be addressed in accordance with Step 5.

This Step is further amended to provide for a recirculation ballot. New text in Step 6 provides the procedures for the re-circulation ballot:

In the recirculation ballot, members of the ballot body shall again be presented the proposed standard (unchanged from the first ballot) along with the reasons for negative votes, the SDT responses, and any resolution of the differences.

All members of the ballot body eligible to vote shall be permitted to reconsider and change their vote from the first ballot. Eligible voting members of the ballot body that did not respond to the first ballot shall be permitted to vote in the recirculation ballot. Only one vote will be accepted from each entity within a segment.

In the recirculation ballot, votes will be counted by exception only – members on the recirculation ballot may indicate a revision to their original vote, otherwise their vote shall remain the same as in the first ballot. If a recirculation ballot is conducted, the results of the recirculation ballot shall determine the status of the standard, regardless of the outcome of the first ballot.

The voting time window for the recirculation ballot is ten (10) days. The 15-day posting is not required for the recirculation ballot. Members of the ballot body may submit comments in the recirculation ballot but no response to these comments is required.

Step 7 – Prepare Consensus Draft & Minority Report (Step 6 in Version 0) provides for the SDT to present the draft Regional Reliability Standard that has been approved by the registered ballot body to SPP RE Staff, the MOPC and the SPP Board of Directors/Members Committee (“BOD/MC”) before final action by the SPP RE Trustees; and for the SDT to also

prepare a Minority Report if there are issues that cannot be resolved by the SDT during the drafting phase from the public comments or the open voting process. New text in this Step provides that the Minority Report will be prepared by SPP RE staff or in coordination with the SDT; that SPP RE staff may work in conjunction with the dissenting parties to prepare the report; and that the Minority Report will include a summary of comments that were rejected by the SDT during the development of the proposed Regional Reliability Standard and the reason these comments were rejected.

Step 8 – Post Draft Standard for Action on the MOPC Agenda (Step 7 in Version 0) is amended to use the term “Consensus Draft SPP RE Regional Reliability Standard” (rather than the “recommended Standard”). This revised terminology is also used in subsequent Steps.

Step 9 – MOPC Review (Step 8 in Version 0) is amended to add a provision stating that if further revision to the Consensus Draft SPP RE Regional Reliability Standard is requested by the MOPC, it will be remanded back to the SDT with comments from the MOPC. Additionally, text is added to this Step to specify that the MOPC shall be provided: (1) the Consensus Draft SPP RE Regional Reliability Standard and any modification or deletion of other related existing Regional Reliability Standards, (2) the Implementation Plan, including recommended field testing and effective dates, (3) technical documentation supporting the Consensus Draft SPP RE Regional Reliability Standard, and (4) a summary of the registered ballot body vote and summary of the comments and responses that accompanied the vote, including a Minority Report if available.

Step 10 – SPP Board of Directors/Members Committee Review (Step 9 in Version 0) is amended to provide that a Consensus Draft SPP RE Regional Reliability Standard submitted to



the SPP BOD/MC for review must be publicly posted in at least seven days in advance of consideration (changed from 10 days in Version 0).

Step 11 – Presentation to SPP RE Trustees (Step 10 in Version 0) is amended to provide that a Consensus Draft SPP RE Regional Reliability Standard submitted to the SPP RE Trustees for action must be publicly posted in at least seven days in advance of consideration (changed from 10 days in Version 0).

Step 12 – SPP RE Trustee Action (Step 11 in Version 0) is amended to provide that while advisory votes of the MOPC and BOD/MC do not impact the SPP RE Trustees’ authority to submit a Consensus Draft SPP RE Regional Reliability Standard to NERC, “the SPP RE Trustees shall give full consideration to the results of the balloting and any dissenting opinions presented within the Minority Report or opinions of the MOPC and BOD/MC.”

Step 13 – Submit to NERC for Approval as SPP RE Regional Reliability Standard (Step 12 in Version 0) is amended to delete a reference to “or any successor organization standards process” after “NERC.”

### **3. Subsection C - Filing of Regional Reliability Standards with Regulatory Agencies**

Subsection C, Filing of Regional Reliability Standards with Regulatory Agencies, is amended to implement common terminology and capitalization conventions.

## **F. Appendix A**

Appendix A of the SPP RE Manual, which is comprised of Section I, Maintenance of SPP RE Regional Reliability Standards Development Process Manual, and Section II, Appeals, is amended to implement common terminology and capitalization conventions and minor non-substantive textual changes, including replacement of the term “withdrawal” (of a Regional Reliability Standard) with “retirement.”

**G. Appendix B: SPP RE Regional Standard Request Form**

Appendix B of the SPP RE Manual is amended to implement common terminology used throughout the amended SPP RE Manual.

**H. Appendix C: SPP RE Regional Standard Request Comment Form**

Appendix C of the SPP RE Manual is also amended to implement common terminology.

**I. Appendix D: SPP RE Regional Reliability Standards Development Procedure**

Appendix D to the SPP RE Manual, which is a flow chart of the Standards Development Process, is amended to reflect the amended process steps described above, including the implementation of common terminology, acronyms and capitalization conventions.

**IV. APPROVAL PROCESS FOR THE AMENDMENTS**

The process to amend the SPP RE Manual was initiated in March 2012. In July 2012, the SPP MOPC established an SPP Standards Process Manual Task Force. A first draft of a revised SPP RE Manual was developed and was posted for comment from January 10, 2013 to February 9, 2013. Comments and questions were received from two entities and were responded to as necessary. A revised version of the amended SPP RE Manual was balloted in March 2013 and was approved with no negative votes. The amended SPP RE Manual was approved by the SPP RE Trustees on June 18, 2013, and submitted to NERC for approval. The detailed history of the development of the amended SPP RE Manual at SPP RE is available here: <http://www.spp.org/section.asp?pageID=164>.

The amended SPP RE Manual was posted on the NERC website from June 26, 2013 to August 9, 2013, with stated questions for stakeholder response. Comments were received from three entities and were considered and responded to as necessary. The NERC Board of Trustees approved the amendments to the SPP RE Manual at its November 7, 2013 meeting. The details

of the posting and approval processes at NERC are available here:

<http://www.nerc.com/pa/Stand/Pages/RegionalReliabilityStandardsUnderDevelopment.aspx>.

## V. CONCLUSION

For the reasons discussed above, NERC respectfully asks the Commission to approve the proposed amendments to the SPP RE Standards Development Process Manual, as discussed in §III herein and shown in **Attachment 2** to this filing, as amendments to a “Regional Entity Rule,” for and for purposes of Exhibit C to the Amended and Restated Delegation Agreement between NERC and SPP RE.

Respectfully submitted,

Gerald W. Cauley  
President and Chief Executive Officer  
North American Electric Reliability  
Corporation  
3353 Peachtree Road NE  
Suite 600, North Tower  
Atlanta, GA 30326  
(404) 446-2560  
(404) 446-9765 – facsimile

/s/ Owen E. MacBride  
Owen E. MacBride  
Schiff Hardin LLP  
233 South Wacker Drive, Suite 6600  
Chicago, IL 60606  
(312) 258-5680  
(312) 258-5700 – facsimile  
[omacbride@schiffhardin.com](mailto:omacbride@schiffhardin.com)

Charles A. Berardesco  
Senior Vice President and General Counsel  
Holly A. Hawkins  
Assistant General Counsel (Standards)  
North American Electric Reliability  
Corporation  
1325 G Street, N.W., Suite 600  
Washington, D.C. 20005  
(202) 400-3000  
(202) 644-8099 – facsimile  
[charles.berardesco@nerc.net](mailto:charles.berardesco@nerc.net)  
[holly.hawkins@nerc.net](mailto:holly.hawkins@nerc.net)

**ATTACHMENT 1**

**AMENDED SOUTHWEST POWER POOL REGIONAL ENTITY  
STANDARDS DEVELOPMENT PROCESS MANUAL**

**CLEAN VERSION**



# **SPP RE Regional Reliability Standards Development Process Manual**

**[insert approval date]**

# Table of Contents

- I. Introduction .....2**
- II. Background .....3**
- III. Regional Reliability Standard Definition, Characteristics, and Elements .....4**
  - A. Definition of a Regional Reliability Standard.....4
  - B. Definition of SPP Criteria .....4
  - C. Characteristics of a Regional Reliability Standard .....4
  - D. Elements of a Regional Reliability Standard .....5
- IV. Roles in the SPP RE Regional Reliability Standards Development Process .....8**
- V. SPP RE Regional Reliability Standards Development Process .....10**
  - A. Assumptions and Prerequisites ..... 10
  - B. SPP RE Regional Reliability Standards Development Process Steps ..... 11
    - Step 1 – Request to Develop, Revise or Retire a SPP RE Regional Reliability Standard ..... 11
    - Step 2 – Notification to Regional Entity Trustees & Public Notice..... 11
    - Step 3 –Standard Drafting Team Formation ..... 12
    - Step 4 – Scoping and Drafting ..... 12
    - Step 5 – Post Draft for 30 Day Public Comments..... 13
    - Step 6 – Open Voting..... 14
    - Step 7 – Prepare Consensus Draft & Minority Report..... 18
    - Step 8 – Post Draft Standard for Action on the MOPC Agenda ..... 19
    - Step 9 – MOPC Review ..... 19
    - Step 10 – SPP Board of Directors/Members Committee Review ..... 19
    - Step 11 –Presentation to SPP RE Trustees..... 20
    - Step 12 – SPP RE Trustees Action..... 20
    - Step 13 – Submit to NERC for Approval as SPP RE Regional Reliability Standard ..... 21
  - C. Filing of Regional Reliability Standards with Regulatory Agencies.....21
- Appendix A .....22**
  - I. Maintenance of SPP RE Regional Reliability Standards Development Process Manual .....22
  - II. Appeals ..... 22
- Appendix B: SPP Regional Standard Request Form .....23**
- Appendix C: SPP Regional Standard Request Comment Form .....25**
- Appendix D: SPP Standards Development Procedure.....26**

# I. Introduction

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This Manual defines the fair and open process for adoption, approval, revision, reaffirmation, and deletion of a Regional Reliability Standard by Southwest Power Pool (SPP), a Regional Entity (RE). Regional Reliability Standards provide for the reliable regional and sub-regional planning and operation of the Bulk Electric System (BES), consistent with Good Utility Practice within an RE's geographical footprint.

Due process is the key to ensuring Reliability Standards are developed in an environment that is equitable, accessible and responsive to the requirements of all interested and affected parties. An open and fair process ensures that all interested and affected parties have an opportunity to participate in a Regional Reliability Standard's development.

Any entity within the SPP RE or SPP RTO (Regional Transmission Organization) region has a right to participate by: a) expressing a position and its basis, b) having that position considered, c) voting on a proposed Regional Reliability Standard through a segment weighted balanced process, and d) having the right to appeal.

## II. Background

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An RE may develop, through its own processes, separate Regional Standards that go beyond, add detail to, or implement NERC Reliability Standards, or otherwise address issues that are not addressed in NERC Reliability Standards.

NERC Reliability Standards and the RE's Regional Standards are all to be included within the RE's Compliance Monitoring and Enforcement Program.

SPP RE's Regional Reliability Standards are developed consistent with the following philosophies and according to the process defined in this Manual:

- A fair and open process that provides an opportunity for all interested parties to participate;
- Avoid any impact on commerce that is not necessary for reliability;
- Provide a level of BES reliability that is adequate to protect public health, safety, welfare, and national security and does not have a significant adverse impact on reliability; and
- A justifiable difference between regions or between sub-regions within the regional geographic area.

The NERC Board of Trustees has adopted reliability principles and market interface principles to define the purpose, scope, and nature of Reliability Standards. These principles are fundamental to reliability and the market interface, and provide a constant beacon to guide the development of Reliability Standards. The NERC Board of Trustees may modify these principles from time to time, as necessary, to adapt its vision for Reliability Standards. Persons and committees that are responsible for the RE Regional Reliability Standards process shall consider these NERC principles in the execution of those duties.

NERC Reliability Standards are based on certain reliability principles that define the foundation of reliability for the North American BES. Each Reliability Standard shall enable or support one or more of the reliability principles, thereby ensuring it serves a purpose in support of reliability of the North American BES. Each Reliability Standard shall also be consistent with all of the reliability principles, thereby ensuring no Reliability Standard undermines reliability through an unintended consequence.

While NERC Reliability Standards are intended to promote reliability, they must at the same time accommodate competitive electricity markets. Reliability is a necessity for electricity markets, and robust electricity markets can support reliability. Recognizing that BES reliability and electricity markets are inseparable and mutually interdependent, all Reliability Standards shall be consistent with the market interface principles. Consideration of the market interface principles is intended to ensure Reliability Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.



### III. Regional Reliability Standard Definition, Characteristics, and Elements

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#### **A. Definition of a Regional Reliability Standard**

A NERC Reliability Standard defines certain obligations or requirements of entities that operate, plan, and use the BES of North America. The obligations or requirements must be material to reliability and measurable. Each obligation and requirement shall support one or more of the stated reliability principles and shall be consistent with all of the stated reliability and market interface principles in the NERC Standards Processes Manual.

SPP RE may develop, through the process described in this Manual, separate SPP RE Regional Reliability Standards that go beyond, add detail to, or implement NERC Reliability Standards, or that cover matters not addressed in NERC Reliability Standards. SPP RE Regional Reliability Standards may be developed and exist separately from NERC Reliability Standards, or may be proposed as NERC Reliability Standards.

SPP RE Regional Reliability Standards that exist separately from NERC Reliability Standards shall be more stringent than a NERC Reliability Standard, including a regional difference that addresses matters that the NERC Reliability Standard does not, or shall be based on a regional difference necessitated by a physical difference in the BES. SPP Regional Reliability Standards, if approved by the SPP RE Trustees, are forwarded to NERC for review and approval and submitted to FERC for approval.

#### **B. Definition of SPP Criteria**

SPP Criteria are requirements used by SPP members for purposes others than those specified for SPP RE Regional Reliability Standards. SPP Criteria are enforceable only under the terms and conditions of the SPP Membership Agreement. SPP Criteria may be developed in accordance with SPP Bylaws outside the process described within this Manual, since these Criteria are not intended to be used by the SPP Regional Entity for compliance and enforcement under its authority delegated by the *NERC–SPP Regional Delegation Agreement*.

#### **C. Characteristics of a Regional Reliability Standard**

SPP RE Regional Reliability Standards define obligations or requirements for the operation and planning of interconnected systems and market interface practices that will be enforceable under SPP RE's authority. The format and process defined by this Manual applies to all SPP RE Regional Reliability Standards.

A Regional Standard shall have the following characteristics:

- **Material to Reliability** - A Regional Reliability Standard shall be material to the reliability of the BES of the RE's region. If the reliability of the BES could be compromised without a particular Regional Reliability Standard or by a failure to comply with that Regional Reliability Standard, the Regional Reliability Standard is material to reliability.

- **Measurable** – A Regional Reliability Standard shall establish technical or performance requirements that can be practically measured.
- **Relative to NERC Reliability Standards** - A Regional Reliability Standard must go beyond, add detail to, or implement NERC Reliability Standards, or cover matters not addressed in NERC Reliability Standards.

**D. Elements of a Regional Reliability Standard**

A 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 Regional Reliability Standards. This discipline is necessary to achieve Regional Reliability Standards that are measurable, enforceable, and consistent. The format allows a clear statement of the purpose, requirements, measures, and penalties for non-compliance associated with each Regional Reliability Standard. Supporting documents to aid in the implementation of a Regional Reliability Standard may be referenced by the Regional Reliability Standard but are not part of the Regional Reliability Standard itself. All mandatory requirements of a Regional Reliability Standard shall be within an element of the Regional Reliability Standard.

*Performance Elements of a Regional Reliability Standard*

<b>Identification Number</b>	A unique identification number assigned in accordance with an administrative classification system to facilitate tracking and reference RE documentation. Format for Regional Standard Request will be: RSR-000.
<b>Title</b>	A brief, descriptive phrase identifying the topic of the Regional Reliability Standard.
<b>Effective Date and Status</b>	The effective date of the Regional Reliability Standard or, prior to adoption of the Regional Reliability Standard by the RE through its own processes, the proposed effective date. The status of the Regional Reliability Standard will be indicated as active or by reference to one of the numbered steps in the RE’s Regional Reliability Standards development process.
<b>Purpose</b>	The purpose of the Regional Reliability Standard. The purpose shall explicitly state what outcome will be achieved or is expected by this Regional Reliability Standard. The purpose is agreed to early in the process as a step toward obtaining approval to proceed with the development of the Regional Reliability Standard. The purpose should link the Regional Reliability Standard to the relevant principle(s).
<b>Requirement(s)</b>	Explicitly stated technical, performance, and preparedness requirements. Each requirement identifies the responsible entity and the action to be performed or outcome 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. (See <i>Supporting Information</i> below).
<b>Applicability</b>	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 SPP area, there should be a clear identification of the portion of the BES to which the

	<p>standard applies. Any limitation on the applicability of the Regional Reliability Standard based on electric facility requirements should be described.</p>
<p><b>Risk Factor(s)</b></p>	<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><b>A High Risk Factor</b> requirement (a) is one that, if violated, could directly cause or contribute to BES instability, separation, or a cascading sequence of failures, or could place the BES 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 BES instability, separation, or a cascading sequence of failures; or could place the BES at an unacceptable risk of instability, separation, or cascading failures; or could hinder restoration to a normal condition.</p> <p><b>A Medium Risk Factor</b> requirement (a) is a requirement that, if violated, could directly affect the electrical state or the capability of the BES, or the ability to effectively monitor and control the BES, but is unlikely to lead to BES 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 affect the electrical state or capability of the BES or the ability to effectively monitor, control, or restore the BES, but is unlikely - under emergency, abnormal, or restoration conditions anticipated by the preparations - to lead to BES instability, separation, or cascading failures, nor to hinder restoration to a normal condition.</p> <p><b>A Lower Risk Factor</b> 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 BES or the ability to effectively monitor and control the BES; 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 BES or the ability to effectively monitor, control, or restore the BES.</p>

<p><b>Measure(s)</b></p>	<p>Each requirement shall be addressed by one or more measurements. Measurements will be used to assess performance and outcomes for the purpose of determining compliance with the requirements stated above. Each measurement identifies to whom the measurement applies and the expected level of performance or outcomes required to demonstrate compliance. Each measurement shall be tangible, practical, and as objective as is practical. Measures are proxies to assess required performance or outcomes. Achieving the measures should be a necessary and sufficient indicator that the requirement was met. Each measure shall clearly refer to the requirements(s) to which it applies.</p>
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*Compliance Elements of a Regional Reliability Standard*

<p><b>Compliance Monitoring Process</b></p>	<p>The following compliance elements, which are part of the Regional Reliability Standard and are balloted with the Regional Reliability Standard, are developed for each measure by the NERC compliance program in coordination with the standard drafting team (SDT):</p> <ul style="list-style-type: none"> <li>• Specific data or information required to measure performance or outcomes.</li> <li>• Entity responsible for providing the data or information for measuring performance or outcomes.</li> <li>• Process used to evaluate data or information for assessing performance or outcomes.</li> <li>• Entity responsible for evaluating data or information to assess performance or outcomes.</li> <li>• Time period in which performance or outcomes is measured, evaluated, and then reset.</li> <li>• Measurement data retention requirements and assignment of responsibility for data archiving.</li> </ul>
<p><b>Violation Severity Levels</b></p>	<p>Defines the degree to which compliance with a requirement was not achieved. The violation severity levels are part of the Regional Reliability Standard and are balloted with the Regional Reliability Standard, and are developed by the NERC compliance program in coordination with the SDT.</p>

*Supporting Information Elements*

<p><b>Interpretations</b></p>	<p>Formally approved interpretations of the Regional Reliability Standard. Interpretations are temporary, as the standard should be revised to incorporate the interpretation. Interpretations are developed and approved through the Regional Reliability Standards Process steps outlined in Section V., Part B of this Manual.</p>
<p><b>Implementation Plan</b></p>	<p>Each Regional Reliability Standard shall have an associated implementation plan describing the effective date of the Regional Reliability Standard or effective dates if there is a phased implementation. The implementation plan may also describe the implementation of the Regional Reliability Standard in the compliance program and other considerations in the initial use of the Regional Reliability Standard, such as necessary tools, training, etc. The implementation plan must be posted for at least one public comment period and is approved as part of the ballot of the Regional Reliability Standard.</p>
<p><b>Supporting References</b></p>	<p>This section references related documents that support reasons for, or otherwise provide additional information related to, the Regional Reliability Standard. Examples include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Development history of the Regional Reliability Standard and prior versions</li> <li>• Notes pertaining to implementation or compliance</li> <li>• Regional Reliability Standard references</li> <li>• Regional Reliability Standard supplements</li> <li>• Procedures</li> <li>• Practices</li> <li>• Training references</li> <li>• Technical references</li> <li>• White papers</li> <li>• Internet links to related information</li> </ul>

## IV. Roles in the SPP RE Regional Reliability Standards Development Process

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Any entity within the SPP RE or SPP RTO region shall be allowed to request a SPP RE Regional Reliability Standard be developed, modified, or retired.

**Originator** - Any entity (person, organization, company, governmental agency, individual, etc.) within the SPP RE or SPP RTO region is allowed to request a SPP RE Regional Reliability Standard be developed or an existing SPP RE Regional Reliability Standard be modified or retired.

**Registered ballot body** - The registered ballot body comprises all entities or individuals that qualify for one of the voting segments and are registered with SPP RE as a ballot participant to vote on a proposed SPP RE Regional Reliability Standard. Membership in SPP is not a requirement for registration. Registration in a ballot body must be completed by close of business the day before voting begins on the proposed SPP RE Regional Reliability Standard action. Each SPP RE Regional Reliability Standard action has its own registered ballot body. The representation model of the registered ballot body is provided in *Sec V. Part B. (Step 6 – Open Voting)*. The outcome of the vote of the registered ballot body is forwarded to the SPP RE Trustees regardless of advisory voting outcomes at the MOPC or SPP Board level.

**SPP Regional Entity Trustees (SPP RE Trustees)** – The SPP RE Trustees shall act on any proposed SPP RE Regional Reliability Standard that has gone through the process contained in this Manual. Upon approval by the SPP RE Trustees, the SPP RE Regional Reliability Standard will be submitted to NERC for approval. SPP RE Trustees are notified of all proposed SPP Regional Reliability Standards requests and receive progress reports from SPP RE staff. They also receive notice of the outcome of votes by the ballot body and any advisory recommendations and reports on proposed SPP RE Regional Reliability Standards made by the Standards Drafting Team (SDT), Markets and Operations Policy Committee (MOPC) and SPP Board.

**Regional Entity Staff (RE staff)** – SPP RE staff shall support the SPP RE Trustees in their oversight authority over the Regional Reliability Standard Development and any other function or responsibility ascribed to them in the *NERC- SPP Delegation Agreement*.

**SPP Markets and Operations Policy Committee (MOPC)** – If accepted in Step 1, the MOPC will assign SPP RE Regional Standards requests to a SDT for development, revision, or retirement.

**SPP Board of Directors and Members Committee (BOD/MC)** – The BOD/MC provide advisory votes to the SPP RE Trustees on reliability matters as they pertain to SPP RE. The BOD/MC votes on proposed SPP RE Regional Reliability Standards or changes to SPP RE Regional Reliability Standards for the sole purpose of providing an additional stakeholder forum for review and valuable input to the SPP RE Trustees’ decision on a SPP RE Regional Reliability Standard, based on the BOD/MC’s expertise on reliability, operations, and market matters, as well as its wide diverse representation of the SPP membership.

**Compliance Director** – The SPP RE staff responsible for the administration of the SPP RE Compliance Monitoring and Enforcement Program. This staff member’s duties include but are not

limited to providing inputs and comments during the SPP Regional Reliability Standards development process to ensure the measures will be effective and can be practically implemented.

**Standard Drafting Team (SDT)** – An SDT is comprised of technical experts that work cooperatively in the development and modification of SPP RE Regional Reliability Standards in accordance with the processes defined in this Manual. Any interested party may participate in meetings and provide input and comments on the proposed SPP RE Regional Standard under provisions of the SPP RE Regional Standards Development Process Manual. However, only SDT members may vote on SDT actions and decisions outside of the open voting process (*Step 6*).

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## V. SPP RE Regional Reliability Standards Development Process

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### **A. Assumptions and Prerequisites**

The process for developing and approving SPP RE Regional Reliability Standards is similar to procedures accredited by the American National Standards Institute (ANSI), like that employed by the North American Energy Standards Board (NAESB). The SPP RE Regional Reliability Standards development process has the following characteristics:

- **Inclusive** - Any entity representing an organization in the SPP RE or SPP RTO region has a right to participate by:
  - a) Expressing an opinion and its basis,
  - b) Having that position considered,
  - c) Voting on a proposed SPP RE Regional Reliability Standard through a segment weighted balanced process, and
  - d) Appealing any negative decision
  
- **Openness** - Participation is open to all entities that are within the SPP RE or RTO region. There shall be no undue financial barriers to participation. Participation shall not be conditioned upon membership in SPP or registration with SPP RE, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements. Meetings of SDTs are open to all interested parties and are noticed on the public SPP website at least seven days in advance. Since pre-existing SPP committees, working groups, or task forces may serve as the base for a SDT, the agenda for these organizational group meetings will note that an SDT activity is being undertaken to distinguish such activity from other non-SDT related agenda items. The openness provisions of this Manual apply only and explicitly to the SDT activities. Meetings of subcommittees and working groups serving as a SDT shall follow the SPP Bylaws Sec 3.5 Meetings.
  
- **Balance** - The SPP RE Regional Reliability Standards Development Process strives to have an appropriate balance of interests. The process prevents any two voting sectors from dominating voting outcomes and no single voting sectors from defeating a proposed SPP RE Regional Reliability standard.
  
- **Due Process** – The SPP RE Regional Reliability Standards Development Process provides reasonable notice and opportunity for public comment. At a minimum, the procedure shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent** – All actions material to the development of an SPP RE Regional Reliability Standard shall be transparent. All SDT meetings shall be open and publicly noticed on the public SPP website.

SPP RE staff will communicate about SPP RE Regional Reliability Standards under development using the customary communication procedures and processes then in place, including but not limited to: posting documents to the public SPP website, publishing newsletter articles, making announcements at SPP organizational group meetings, and sending notifications to SPP public email exploder lists such as the MOPC, Board of Directors, RE Trustees, and RE Standards Development lists. Interested parties may subscribe to public exploder lists via the SPP public website or by contacting the SPP customer relations department.

## **B. SPP RE Regional Reliability Standards Development Process Steps**

**Notes:** The term “days” below refers to calendar days. The following process steps apply to developing, revising, or retiring an SPP RE Regional Reliability Standard.

### **Step 1 – Request to Develop, Revise or Retire a SPP RE Regional Reliability Standard**

Any entity within the geographical footprint of SPP RE or SPP RTO region may submit a request to the MOPC for the development, modification, or deletion of a SPP RE Regional Reliability Standard. Any such request shall be submitted to the MOPC Chairman, or his/her designee, or by another process as otherwise posted on the public SPP website. The request should be made using the SPP RE Regional Standard Request Form (RSR) in Appendix B.

The MOPC or a designee will work with the Originator to develop a description of the proposed SPP RE Regional Reliability Standard’s subject matter containing sufficient detail to clearly define the purpose, scope, impacted parties, and other relevant information related to the proposed SPP RE Regional Reliability Standard. Following the development of a request, the MOPC may take one of the following actions:

- Remand the request back to the Originator for additional work and information.
- Accept the request as a candidate for a new or revised regional standard.
- Reject the request. If the MOPC rejects a request, it will provide a written explanation for rejection to the Originator and the RE Trustees within 30 days of the rejection decision.

If rejected by MOPC, the RE Trustees may accept MOPC’s decision or move it forward for consideration (Step 2).

### **Step 2 – Notification to Regional Entity Trustees & Public Notice**

Once accepted as a candidate for a new or revised SPP RE Regional Reliability Standard, the Chairman of the MOPC or his/her designee will forward the request to the SPP RE Trustees. SPP RE staff will post the request on the public SPP website for public notice and may utilize any customary communication procedures then in effect. The request is not to be judged as appropriate or useful at this stage.



### **Step 3 –Standard Drafting Team Formation**

For each new SPP RE Regional Reliability Standard request, MOPC will use the customary communication procedures and processes then in effect to request that interested parties who wish to serve on the SDT submit their names and qualifications to MOPC. The request will also be posted on the public SPP website. MOPC will establish a 30-day window for submittal of nominations. MOPC will then appoint to the SDT individuals with the necessary technical expertise. SDT membership shall not be conditioned upon membership in SPP or registration with SPP RE. If the open nominations process does not solicit enough SDT members, MOPC may assign the request to an existing working group.

The MOPC’s assignment to the SDT will include any necessary deadlines and due dates for the proposed SPP RE Regional Reliability Standard.

Any documentation of the deliberations of the SDT concerning the proposed SPP RE Regional Reliability Standard shall be made available in accordance with the SPP Bylaws requirements for meeting and organizational groups then in effect. Meetings of the SDT are open to any interested party, but only SDT members may vote on SDT actions and decisions outside of the open voting process (*Step 6*). Meeting dates and actions on the proposed SPP RE Regional Reliability Standard are publicly noticed on the public SPP website.

The SDT shall provide a report to the SPP RE Trustees and the MOPC on a periodic basis (at least at every regularly scheduled meeting) noting the status of the proposed SPP RE Regional Reliability Standard that has been assigned to it for consideration.

### **Step 4 – Scoping and Drafting**

The SDT will draft the language of the proposed SPP RE Regional Reliability Standard per the description provided by the MOPC and the Originator. The SDT may recommend changes to the scope, purpose, need or other relevant aspects of the proposed SPP RE Regional Reliability Standard, including termination of the proposed SPP RE Regional Reliability Standard, through consultation with the MOPC.

The SDT will develop a work plan for completing the proposed SPP RE Regional Reliability Standard development work, including the establishment of milestones for completing critical elements of the work in sufficient detail to ensure that the SDT will meet the date objective in the assignment, or an alternative date. This plan will be provided to the SPP RE Trustees and the MOPC.

The SDT may meet in person or via electronic means as necessary, may establish sub-work teams (made up of members of the SDT) as necessary, and may perform other activities to address the parameters of the proposed SPP RE Regional Reliability Standard and the established milestone date(s).

The SDT should consider:

- The impact of the proposed SPP RE Regional Reliability Standard on neighboring regions and seek appropriate input from the neighboring regions if the proposed SPP RE Regional

Reliability Standard is determined to have such an impact.

- An implementation plan, including the nature, extent and duration of field-testing, if any.
- The need for any existing proposed SPP RE Regional Reliability Standard to be retired, in part or whole, or otherwise impacted by the implementation of the draft proposed SPP RE Regional Reliability Standard.
- Technical reports, white papers and/or work papers that provide technical support for the proposed SPP RE Regional Reliability Standard under consideration.
- Documenting the perceived reliability impact should the proposed SPP RE Regional Reliability Standard be approved.

The SDT will regularly (at least at every regularly scheduled meeting) report to the SPP RE Trustees and the MOPC on its progress in meeting a timely completion of the draft proposed SPP RE Regional Reliability Standard. The SDT may request consideration of scope changes or termination of the proposed SPP RE Regional Reliability Standard at any point in the SPP RE Regional Reliability Standard development process.

The SPP RE Trustees or the MOPC may at any time direct the SDT move to *Step 5-Public Comments* and post for comment the current work product, or terminate activity if there is no further need for the proposed SPP RE Regional Reliability Standard. If the activity is terminated, SPP RE staff will notify the Originator and the SPP RE Trustees within 30 days.

If there are competing drafts, all will be posted on the public SPP website for comment. The MOPC may take this step at any time after a SDT has been commissioned to develop the proposed SPP RE Regional Reliability Standard.

For proposed SPP RE Regional Reliability Standards in progress, the MOPC must take action to move to *Step 5-Public Comments* or reject the proposal. If the MOPC votes to terminate the activity, the SPP RE Trustees must be notified with supporting reasons provided to them. The proposed SPP Regional Reliability Standard would then go directly to *Step 12 – SPP RE Trustees Action*.

### **Step 5 – Post Draft for 30 Day Public Comments**

SPP RE staff will post the draft of the proposed SPP RE Regional Reliability Standard on the public SPP website, along with any supporting documents, for a 30-day comment period. SPP RE staff shall also inform Registered Entities and other potentially interested stakeholders of the posting using the customary communication procedures and processes then in effect. Comments may be submitted using the RSR Comment Form in Appendix B, also available on the public SPP website.

Within 30 days of the conclusion of the 30-day comment period, the SDT shall convene and consider the written views and objections of all participants as they relate to the draft proposed SPP RE Regional Reliability Standard, the implementation plan, and/or supporting technical documents. The SDT shall prepare a summary of the comments received and any changes made as a result of the comments. The summary, along with a response to each comment received, will be posted on the SPP website no later than the next posting of the proposed standard. Following its consideration of

comments, the SDT may elect to return to Step 4 *Scoping and Drafting* to further revise the proposed SPP RE Regional Reliability Standard and/or any supporting documentation.

### **Step 6 – Open Voting**

The SDT shall direct SPP RE staff to post the revised draft proposed SPP RE Regional Reliability Standard and other relevant documents, including but not limited to, the implementation plan, supporting technical documentation, and summary of comments.

#### **First Ballot**

SPP RE staff will schedule a vote by interested parties to commence no sooner than 15 days and no later than 30 days following the posting of the revised draft. Ballot body registration will begin the day the revised draft is posted. Interested parties may register for the ballot body over a period of 15 days. The 15-day ballot body registration will be followed by a 15-day voting period. SPP RE staff will use the customary communication procedures and processes then in effect to notify interested parties of the ballot body registration period and the voting period and will post the notification on the public SPP website.

Votes must be submitted by close of business on the final day of the voting period. Voting will be through electronic means or other means provided by SPP.

#### **SPP Segment Weighted Voting**

Entities within the SPP RE or SPP RTO region may participate in the voting process. To vote on a proposed SPP RE Regional Reliability Standard, an entity must register in a ballot body created for that specific draft of the proposed SPP RE Regional Reliability Standard. Registration must be submitted by close of business on the final day of the ballot body registration period. The registered ballot body comprises all entities or individuals that qualify for one of the SPP RE Regional Reliability Standards segments and are registered with SPP RE as a ballot body participant. A registered ballot body participant cannot change segments during a balloting period once the participant has cast a vote or designated a proxy. When registering for a subsequent ballot(s) of the same proposed SPP RE Regional Reliability Standard, an entity cannot change the segment for which it previously registered.

The five SPP voting segments for Regional Reliability Standards are:

- 1) Transmission
- 2) Generation
- 3) Marketer/Broker
- 4) Distribution/Load Serving Entity
- 5) End User and Public Interest

Any entity that can meet any one of the segment qualifications below is entitled to register and vote in that segment. Only one vote per entity per segment is permitted. For purposes of SPP RE Regional Reliability Standard ballot body registration and voting, an entity is defined as an individual or organization that has a separate legal identity. Affiliates (subsidiary, parent, or sibling corporations) shall be treated as one entity except in instances where the affiliates are separately registered in the NERC Compliance Registry, in which case the affiliates may be treated as separate

entities. Entities registered in multiple regions will not be able to register on behalf of more than one regional registration.

The segment qualifications are as follows (only one of the segment qualifications must be met):

**1) Transmission**

- a. Any entity within the SPP RE or SPP RTO region that owns and maintains transmission facilities
- b. Any entity within the SPP RE or SPP RTO region responsible for the reliability of its local transmission system and operates or directs the operations of the transmission facilities
- c. Any entity within the SPP RE or SPP RTO region that develops a long-term (generally one year and beyond) plan for the reliability (adequacy) of the interconnected bulk electric transmission systems within its portion of the PA area
- d. Any entity within the SPP RE or SPP RTO region that administers the transmission tariff and provides transmission service to transmission customers under applicable transmission service agreements
- e. Any entity within the SPP RE or SPP RTO region that coordinates and integrates transmission facility and service plans, resource plans, and protection systems
- f. Any entity within the SPP RE or SPP RTO region that is responsible for the reliable operation of the BES, has the wide area view of the BES, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations

**2) Generation**

- a. Any entity within the SPP RE or SPP RTO region that owns and maintains generating units, including variable and other renewable resources
- b. Any entity within the SPP RE or SPP RTO region that operates generating unit(s) and performs the functions of supplying energy and interconnected operations services
- c. Any entity within the SPP RE or SPP RTO region that integrates resource plans ahead of time, maintains load-interchange-generation balance within a BA area, and supports Interconnection frequency in real-time
- d. Any entity within the SPP RE or SPP RTO region that authorizes implementation of valid and balanced Interchange Schedules between Balancing Authority Areas, and ensures communication of Interchange information for reliability assessment purposes
- e. Any entity within the SPP RE or SPP RTO region that coordinates and integrates transmission facility and service plans, resource plans, and protection systems
- f. Any entity within the SPP RE or SPP RTO region that purchases or sells and takes title to energy, capacity, and interconnected operations services
- g. Any entity within the SPP RE or SPP RTO region that is responsible for the reliable operation of the BES, has the wide area view of the BES, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations
- h. Any entity within the SPP RE or RTO region that develops a long-term (generally one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a planning authority area

**3) Marketer/Broker**

- a. Any entity within the SPP RE or SPP RTO region serving end-use customers under a power marketing agreement or other authorization not classified as a regulated tariff
- b. Any entity within the SPP RE or SPP RTO region that buys, sells, or brokers energy and related services for resale in wholesale or retail markets, whether a non-jurisdictional entity operating within its charter or an entity licensed by a jurisdictional regulator
- c. Any entity within the SPP RE or SPP RTO region that is a Generation and Transmission (G&T) cooperative or joint-action agency that performs an electricity broker, aggregator, or marketer function
- d. Any entity within the SPP RE or SPP RTO region that is an agent or association that represents groups of electricity brokers, aggregators, or marketers
- e. Any entity within the SPP RE or SPP RTO region that is a demand-side management provider

**4) Distribution/Load Serving Entity**

- a. Any entity within the SPP RE or SPP RTO region that provides and operates the “wires” between the transmission system and the end-use customer
- b. Any entity within the SPP RE or SPP RTO region that secures energy and transmission service (and related interconnected operations services) to serve the electrical demand and energy requirements of its end-use customers
- c. Any entity within the SPP RE or SPP RTO region that purchases or sells and takes title to energy, capacity, and interconnected operations services

**5) End User and Public Interest**

- a. Any entity within the SPP RE or SPP RTO region with service delivery taken that is not purchased for resale
- b. Any governmental entity or agency within the SPP RE or SPP RTO region, including public utility commissions
- c. An entity within the SPP RE or SPP RTO region that qualifies for registration in another segment may not register in the End User/Public Interest segment. Any individual currently employed by an entity that is eligible to join one or more of the other segments shall not be qualified to join the End User/Public Interest segment.

SPP RE staff will accept votes any time during the 15-day ballot period for the draft proposed SPP RE Regional Reliability Standard. Votes must be submitted by close of business on the final day of the ballot period. Votes will be counted by voting segment. Each voting segment will receive 20% of the vote, unless there are less than five votes in the segment and then the segment vote will be adjusted as provided for below.

**Criteria for Ballot Pool Approval**

For a Regional Reliability Standard action to be approved by the ballot body and passed on for further consideration (*Step 8- Post Draft Standard for Action on the MOPC Agenda*) the following is required:

- A quorum of registered ballot body members, which is established by at least 75% of the members of the registered ballot body casting a ballot, whether that ballot is affirmative, negative, or an abstention. A quorum is not reached when 75% of the registered ballot body is equal to or less than three; and
- A two-thirds (66.67%) 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.

The following process will be used to determine if there are sufficient affirmative votes for ballot body approval:

- For each segment with five or more votes, the number of affirmative votes shall be divided by the sum of affirmative and negative votes to determine the fractional vote for the segment. This resulting fractional percentage shall be carried forward to the combined total of affirmative votes for all segments; the negative votes shall be tallied in the same manner and shall be carried forward in the combined total of negative votes for all segments. Abstentions and non-responses shall not be counted in the segment's fractional affirmative or negative vote.
- For each segment with less than five votes, the segment's vote weight shall be proportionally reduced. Each affirmative or negative vote (excluding abstentions and non-responses) within that segment shall receive a weight of 20% of the segment vote (.20) within the appropriate vote column (affirmative or negative). The fractional sum total for each of the columns, affirmative and negative, shall be carried forward to the combined total of affirmative and negative votes for all segments.

The result of the total fractional sum of affirmative votes combined from all voting segments, divided by the total fractional sum of total affirmative and negative votes from all voting segments, shall be the percentage used to determine if the ballot has attained a two-thirds (66.67%) needed for ballot body approval of the SPP RE Regional Reliability Standard action and to be moved on for further consideration.

If the vote fails to achieve the required two-third majority of those voting as provided for herein, the proposed SPP RE Regional Reliability Standard will be returned to the SDT for consideration for future action (*Step 4- Scoping and Drafting*). The SDT may revise the proposed SPP RE Regional Reliability Standard, post the draft proposed SPP RE Regional Reliability Standard again for comments, reballot the proposed SPP RE Regional Reliability Standard, ask the SPP RE Trustees to terminate the request, or take any other action it deems appropriate.

In the event that the proposed SPP RE Regional Reliability Standard receives the required two-third majority of those voting but also receives negative votes with comments during the ballot period, those comments shall be addressed in accordance with *Step 5* and included with a re-circulation ballot.

### **Recirculation Ballot**

In the recirculation ballot, members of the ballot body shall again be presented the proposed standard (unchanged from the first ballot) along with the reasons for negative votes, the SDT responses, and any resolution of the differences.

All members of the ballot body eligible to vote shall be permitted to reconsider and change their vote from the first ballot. Eligible voting members of the ballot body that did not respond to the first ballot shall be permitted to vote in the recirculation ballot. Only one vote will be accepted from each entity within a segment.

In the recirculation ballot, votes will be counted by exception only - members on the recirculation ballot may indicate a revision to their original vote, otherwise their vote shall remain the same as in the first ballot. If a recirculation ballot is conducted, the results of the recirculation ballot shall determine the status of the standard, regardless of the outcome of the first ballot.

The voting time window for the recirculation ballot is ten (10) days. The 15-day posting is not required for the recirculation ballot. Members of the ballot body may submit comments in the recirculation ballot but no response to those comments is required.

The SPP RE Trustees are notified of the outcome of the vote(s) and any actions taken by the SDT as a result of the vote(s). The SPP RE Trustees will determine any additional action to be taken. (*Step 12-SPP RE Trustees Action.*)

### **Step 7 – Prepare Consensus Draft & Minority Report**

When a draft of the proposed SPP RE Regional Reliability Standard is approved by the SPP RE Regional Reliability Standard registered ballot body, the SDT will present the approved draft of the proposed SPP RE Regional Reliability Standard (Consensus Draft SPP RE Regional Reliability Standard) to SPP RE staff, the MOPC and the BOD/MC before final action by the SPP RE Trustees.

### **Minority Report and Appeals**

A minority report will be prepared if there are issues not resolved by the SDT during the drafting phase (*Step 4*), from the public comments (*Step 5*) or from the open voting process (*Step 6*).

- The minority report will be prepared by SPP RE staff or in coordination with the SDT. SPP RE staff may work in conjunction with the dissenting parties to prepare the report.
- The minority report will include a summary of comments that were rejected by the SDT during the development of the proposed SPP RE Regional Reliability Standard and the reason(s) that these comments were rejected, in part or whole.
- A minority report will include any appeals from interested parties that the SPP RE Regional Standards Development Process Manual was violated in the development of the proposed SPP RE Regional Reliability Standard.
- The minority report will remain a part of the record of the proposed SPP RE Regional Reliability Standard and will be available to any interested party during any subsequent steps.

- The Consensus Draft SPP RE Regional Reliability Standard and any minority reports will be presented to the MOPC for its consideration and an advisory vote.

### **Step 8 – Post Draft Standard for Action on the MOPC Agenda**

The Consensus Draft SPP RE Regional Reliability Standard will be noticed for consideration on the MOPC agenda. The agenda materials will be made available per the SPP Bylaws, Section 3.5. If a Consensus Draft SPP RE Regional Reliability Standard requires consideration by the MOPC prior to a regularly scheduled meeting, SPP RE staff will notify the MOPC Chairman, who will notice a special meeting in accordance with the SPP Bylaws.

### **Step 9 – MOPC Review**

The MOPC will provide an advisory vote on the Consensus Draft SPP RE Regional Reliability Standard under the governance provisions of the SPP Bylaws, Section 3.9-Voting. If the MOPC opposes the Consensus Draft SPP RE Regional Reliability Standard, the MOPC may request revision of the Consensus Draft SPP RE Regional Reliability Standard or termination of further activity on the proposed SPP RE Regional Reliability Standard. If the proposed SPP RE Regional Reliability Standard is terminated, notice will be provided to the SDT, SPP RE staff, and SPP RE Trustees for further action (*Step 12*). If further revision is requested by the MOPC, the Consensus Draft SPP RE Regional Reliability Standard will be remanded back to the SDT with comments from the MOPC.

The MOPC shall be provided:

- The Consensus Draft SPP RE Regional Reliability Standard and any modification or deletion of other related existing SPP RE Regional Reliability Standard(s)
- Implementation Plan (including recommended field testing and effective dates)
- Technical documentation supporting the Consensus Draft SPP RE Regional Reliability Standard
- A summary of the registered ballot body vote and summary of the comments and responses that accompanied the votes, including a Minority Report if applicable

If the MOPC concurs with the Consensus Draft SPP RE Regional Reliability Standard, the Consensus Draft SPP RE Regional Reliability Standard will proceed to the SPP Board of Directors and Members Committee for review (*Step 10-SPP RE Trustees Action*).

The SPP RE Trustees will be notified of the outcome of the MOPC review.

### **Step 10 – SPP Board of Directors/Members Committee Review**

A Consensus Draft SPP RE Regional Reliability Standard submitted to the SPP Board of Directors/Members Committee (BOD/MC) for review must be publicly posted at least seven days prior to consideration by the BOD/MC. The BOD/MC may consider the Consensus Draft SPP RE Regional Reliability Standard at a regularly scheduled meeting or as determined by the Chairman of the BOD/MC.

The BOD/MC shall be provided:



- The Consensus Draft SPP RE Regional Reliability Standard and any modification or deletion of other related existing SPP RE Regional Reliability Standard(s)
- Implementation Plan (including recommended field testing and effective dates)
- Technical documentation supporting the Consensus Draft SPP RE Regional Reliability Standard
- A summary of the registered ballot body vote and summary of the comments and responses that accompanied the votes, including a Minority Report if applicable
- The results of the MOPC advisory vote and any comments
- Any other information relevant to the proposed SPP RE Regional Reliability Standard

The BOD/MC will:

- Provide an advisory vote to the SPP RE Trustees on the Consensus Draft SPP RE Regional Reliability Standard (*Step 11- Presentation to SPP RE Trustees*); or
- Return the Consensus Draft SPP RE Regional Reliability Standard to the MOPC with comments

In the case of a second return of a proposed SPP RE Regional Reliability Standard from the BOD/MC to MOPC, the proposed SPP RE Regional Reliability Standard will be forwarded to the SPP RE Trustees for action (*Step 12-SPP RE Trustees Action*).

### **Step 11 –Presentation to SPP RE Trustees**

A Consensus Draft SPP RE Regional Reliability Standard submitted to the SPP RE Trustees for action must be publicly posted at least seven days prior to consideration by the SPP RE Trustees.

The SPP RE Trustees shall be provided:

- The Consensus Draft SPP RE Regional Reliability Standard and any modification or deletion of other related existing SPP RE Regional Reliability Standard(s)
- Implementation Plan (including recommended field testing and effective dates)
- Technical documentation supporting the Consensus Draft SPP RE Regional Reliability Standard
- A summary of the registered ballot body vote and summary of the comments and responses that accompanied the vote including a Minority Report if applicable
- The results of the MOPC advisory vote and any associated comments
- The results of the BOD/MC advisory vote and any associated comments
- Any other information relevant to the proposed SPP RE Regional Reliability Standard

### **Step 12 – SPP RE Trustees Action**

The SPP RE Trustees will:

- Recommend NERC approve the Consensus Draft SPP RE Regional Reliability Standard through the NERC process; or
- Remand the Consensus Draft SPP RE Regional Reliability Standard to the SDT through the MOPC with comments and instructions; or
- Determine there is no need for the Consensus Draft SPP RE Regional Reliability Standard and terminate any future activity.

The SPP RE Trustees may consider the Consensus Draft SPP RE Regional Reliability Standard at a regularly scheduled meeting, or as determined by the Chairman of the SPP RE Trustees.

If a Consensus Draft SPP RE Regional Reliability Standard is forwarded to the SPP RE Trustees for action as a result of an opposing MOPC vote (*Step 9- MOPC Review*) or if automatically forwarded to them as a result of two or more returns by the MOPC or SPP BOD/MC (*Step 10- SPP Board of Directors/Members Committee Review*), the SPP RE Trustees will take definitive action, including initiating the process from *Step 4-Scoping and Drafting*. The SPP RE Trustees may not submit a proposed SPP RE Regional Reliability Standard to NERC for approval without a positive outcome from open and balanced voting per *Step 6-Open Voting*.

Advisory votes of the MOPC and the BOD/MC do not impact the SPP RE Trustees' authority to submit a Consensus Draft SPP RE Regional Reliability Standard to NERC. However, the SPP RE Trustees shall give full consideration to the results of the balloting and any dissenting opinions presented within the Minority Report or opinions of the MOPC and BOD/MC.

### **Step 13 – Submit to NERC for Approval as SPP RE Regional Reliability Standard**

SPP RE staff will notify interested parties of submission of a Consensus Draft SPP RE Regional Reliability Standard to NERC by the SPP RE Trustees through the customary communication procedures and processes then in effect. SPP RE staff will publicly notice any further steps necessary to have a Consensus Draft SPP RE Regional Reliability Standard reviewed and/or approved through the NERC.

### **C. Filing of Regional Reliability Standards with Regulatory Agencies**

The development of Regional Reliability Standards must be administered in coordination with NERC's Standards Development Processes. At the discretion of the NERC Board of Trustees, adopted Reliability Standards may be filed with applicable regulatory agencies in the United States, Canada, and Mexico. Regional Reliability Standards, once approved by FERC, are made part of the NERC Reliability Standards and shall be enforced accordingly.

## **Appendix A**

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### **I. Maintenance of SPP RE Regional Reliability Standards Development Process Manual**

Any interested party may propose changes to this manual. Such manual change requests will follow all the steps of the SPP RE Regional Reliability Standards Process outlined in Section V, Part B of this manual.

### **II. Appeals**

Persons who have directly and materially affected interests and who have been or will be adversely affected by any substantive or procedural action or inaction related to the development, approval, revision, reaffirmation, or retirement of a SPP RE Regional Reliability Standard shall have the right to appeal. This appeals process applies only to the SPP RE Regional Reliability Standards Process as outlined in Section V, Part B of this Manual.

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. In all cases, the request for appeal must be made prior to the next step in the process.

The appeal will be addressed by the SPP RE Trustees. The appeal is included in a Minority Report of the Consensus Draft SPP RE Regional Reliability Standard, which remains a part of the record for the proposed SPP RE Regional Reliability Standard throughout the SPP RE Regional Standards Development Process.

The SPP RE Trustee's final decisions of any appeal shall be documented in writing and made public.

A complaint will be noted in a Minority Report, including the substantive or procedural action or inaction associated with a proposed SPP RE Regional Reliability Standard or the SPP RE Regional Standards Development Process. The complaint should describe the actual or potential adverse impact to the appellant. The SPP RE Trustees will provide a written response to the complaint. The appellant's response to the SPP RE Trustees determination will be included in the Minority Report.

The SPP RE Trustees shall provide a response to any remaining open complaints.

## Appendix B: SPP RE Regional Standard Request Form

RSR Number _____	_____	RSR Title _____	_____
<b>SPP RE Regional Reliability Standard Name</b> (include Section No., Title, and existing Standard Version if any) _____			
<b>Requested Resolution Date (if applicable)</b> _____			
Description _____			
<b>Reliability Need or Purpose – Try to identify if known: Technical requirements, reliability risk factor, measurements (refer to SPP RE Regional Reliability Standards Development Process Manual for descriptions).</b> _____			
<b>Tariff Implications or Changes (Yes or No; If yes include a summary of impact and/or specific changes)</b> _____			
<b>Criteria Implications or Changes (Yes or No; If yes include a summary of impact and/or specific changes)</b> _____			
<b>NERC Standard Implications (Yes or No, and summary of impact)</b> _____			

<b>Sponsor</b>	
_____	
<b>Name</b> _____	_____

<b>E-mail Address</b>	
<b>Company</b>	
<b>Company Address</b>	
<b>Phone Number</b>	
<b>Fax Number</b>	

<b>Proposed Regional Standard Language</b>
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## Appendix C: SPP RE Regional Standard Request Comment Form

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<b>RSR Number</b> _____	_____	<b>RSR Title</b> _____	_____
----------------------------	-------	---------------------------	-------

<b>Date</b> _____	_____
----------------------	-------

Submitter's Information	
<b>Name</b> _____	_____
<b>E-mail Address</b> _____	_____
<b>Company</b> _____	_____
<b>Company Address</b> _____	_____
<b>Phone Number</b> _____	_____
<b>Fax Number</b> _____	_____

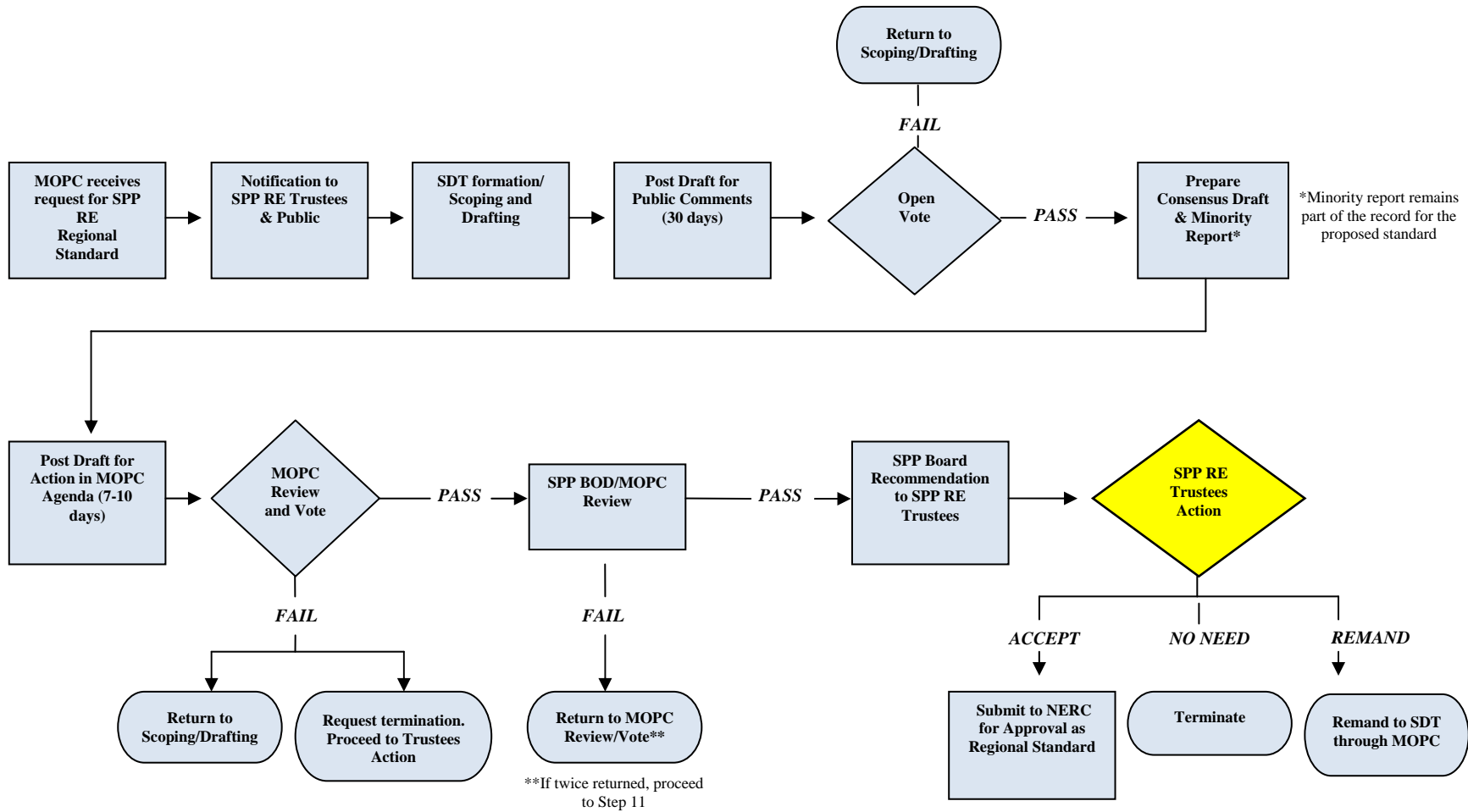
**Comment Form Instructions (please delete before submitting comments):**

Comments are to be submitted electronically and are due by close of business of the comment due date. Please follow this file naming convention:  
**###PRR <Company Name> Comments<date>.doc.**

<b>Comments</b>
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<b>Revised Regional Standard Language</b>
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# Appendix D: SPP RE Regional Reliability Standards Development Procedure



**ATTACHMENT 2**

**AMENDED SOUTHWEST POWER POOL REGIONAL ENTITY  
STANDARDS DEVELOPMENT PROCESS MANUAL**

**REDLINED VERSION**





~~Southwest Power Pool~~ SPP RE  
~~Regional Entity~~ Reliability  
~~Standards Development Process~~  
~~Manual~~

~~October 2, 2007~~ [insert approval date]



## Table of Contents

<b>I. Introduction</b> .....	<b>3</b>
<b>II. Background</b> .....	<b>4</b>
<b>III. Regional Reliability Standard Definition, Characteristics, and Elements</b> .....	<b>5</b>
A. Definition of a Regional Reliability Standard .....	5
B. Definition of SPP Criteria .....	5
C. Characteristics of a Regional Reliability Standard .....	5
D. Elements of a Regional Reliability Standard .....	6
<b>IV. Roles in the SPP Regional Reliability Standards Development Process</b> .....	<b>10</b>
<b>V. SPP Regional Reliability Standards Development Process</b> .....	<b>12</b>
A. Assumptions and Prerequisites .....	12
B. SPP Regional Reliability Standards Development Process Steps .....	13
C. Filing of Regional Reliability Standards with Regulatory Agencies .....	21
<b>Appendix A</b> .....	<b>22</b>
I. Maintenance of the SPP RE Standards Development Process Manual .....	22
II. Appeals .....	22
<b>Appendix B: SPP Regional Standard Request Form</b> .....	<b>23</b>
<b>Appendix C: SPP Regional Standard Request Comment Form</b> .....	<b>24</b>
<b>Appendix D: SPP Standards Development Procedure</b> .....	<b>27</b>

## Table of Contents

<b>I. Introduction</b> .....	<b><u>22</u></b>
<b>II. Background</b> .....	<b><u>343</u></b>
<b>III. Regional Reliability Standard Definition, Characteristics, and Elements</b> .....	<b><u>454</u></b>
A. Definition of a Regional Reliability Standard .....	<u>454</u>
B. Definition of SPP Criteria .....	<u>454</u>
C. Characteristics of a Regional Reliability Standard .....	<u>454</u>
D. Elements of a Regional Reliability Standard .....	<u>565</u>
<b>IV. Roles in the SPP RE Regional Reliability Standards Development Process</b> .....	<b><u>898</u></b>
<b>V. SPP RE Regional Reliability Standards Development Process</b> .....	<b><u>101110</u></b>

A.	Assumptions and Prerequisites .....	<a href="#">101110</a>
B.	SPP RE Regional Reliability Standards Development Process Steps .....	<a href="#">111211</a>
	Step 1 – Request to Develop, Revise or Retire a SPP RE Regional Reliability Standard .....	<a href="#">111211</a>
	Step 2 – Notification to Regional Entity Trustees & Public Notice.....	<a href="#">111211</a>
	Step 3 –Standard Drafting Team Formation .....	<a href="#">121312</a>
	Step 4 – Scoping and Drafting .....	<a href="#">121312</a>
	Step 5 – Post Draft for 30 Day Public Comments.....	<a href="#">131413</a>
	Step 6 – Open Voting.....	<a href="#">141514</a>
	Step 7 – Prepare Consensus Draft & Minority Report.....	<a href="#">181917</a>
	Step 8 – Post Draft Standard for Action on the MOPC Agenda .....	<a href="#">192019</a>
	Step 9 – MOPC Review .....	<a href="#">192019</a>
	Step 10 – SPP Board of Directors/Members Committee Review .....	<a href="#">192120</a>
	Step 11 –Presentation to SPP RE Trustees.....	<a href="#">202120</a>
	Step 12 – SPP RE Trustees Action.....	<a href="#">202221</a>
	Step 13 – Submit to NERC for Approval as SPP RE Regional Reliability Standard .....	<a href="#">212221</a>
C.	Filing of Regional Reliability Standards with Regulatory Agencies.....	<a href="#">2122</a>
<b>Appendix A</b> .....		<a href="#">222423</a>
	I. Maintenance of SPP RE Regional Reliability Standards Development Process Manual	<a href="#">222423</a>
	II. Appeals .....	<a href="#">222423</a>
<b>Appendix B: SPP Regional Standard Request Form</b> .....		<a href="#">232524</a>
<b>Appendix C: SPP Regional Standard Request Comment Form</b> .....		<a href="#">252726</a>
<b>Appendix D: SPP Standards Development Procedure</b> .....		<a href="#">262827</a>

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## I. Introduction

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This ~~M~~anual defines the fair and open process for adoption, approval, revision, reaffirmation, and deletion of a ~~regional-Regional R~~egional Reliability ~~S~~standard (~~Standard~~) by Southwest Power Pool (~~SPP~~), a ~~regional-Regional entity-Entity~~ (RE). ~~Regional Reliability~~ Standards provide for the reliable regional and sub-regional planning and operation of the Bulk ~~Power-Electric~~ System (~~BPSBES~~), consistent with Good Utility Practice within an RE's geographical footprint.

Due process is the key to ensuring ~~Reliability s~~that Standards are developed in an environment that is equitable, accessible and responsive to the requirements of all interested and affected parties. An open and fair process ensures that all interested and affected parties have an opportunity to participate in a ~~Regional Reliability~~ Standard's development.

Any entity (~~person, organization, company, government agency, individual, etc.~~) within the ~~with a direct and material interest in the SPP RE or SPP RTO (Regional Transmission Organization) Bulk Power System~~BPregionSBES has a right to participate by: a) expressing a position and its basis, b) having that position considered, c) voting on a proposed ~~r~~Regional ~~r~~Reliability ~~s~~Standard through a segment weighted balanced process, and d) having the right to appeal.

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## II. Background

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An RE may develop, through its own processes, separate [Regional](#) Standards that go beyond, add detail to, or implement NERC ~~r~~[Reliability](#) ~~s~~[Standards](#), or otherwise address issues that are not addressed in NERC ~~r~~[Reliability](#) ~~s~~[Standards](#).

NERC ~~r~~[Reliability](#) ~~s~~[Standards](#) and the RE's [Regional](#) Standards are all to be included within the RE's Compliance [Monitoring and Enforcement](#) Program.

[SPP RE's Regional](#) Reliability Standards are developed consistent with the following philosophies and according to the process defined in this ~~M~~[Manual](#):

- A fair and open process that provides an opportunity for all interested parties to participate;
- Avoid any impact on commerce that is not necessary for reliability;
- Provide a level of [BPSBES](#) reliability that is adequate to protect public health, safety, welfare, and national security and ~~doe~~[s](#) not have a significant adverse impact on reliability; and
- A justifiable difference between regions or between sub-regions within the ~~r~~[Regional](#) geographic area.

The NERC Board of Trustees has adopted reliability principles and market interface principles to define the purpose, scope, and nature of ~~r~~[Reliability](#) ~~s~~[Standards](#). These principles are fundamental to reliability and the market interface, and provide a constant beacon to guide the development of ~~r~~[Reliability](#) ~~s~~[Standards](#). The NERC Board of Trustees may modify these principles from time to time, as necessary, to adapt its vision for ~~r~~[Reliability](#) ~~s~~[Standards](#). Persons and committees that are responsible for the RE [Regional Reliability](#) Standards process shall consider these NERC principles in the execution of those duties.

NERC ~~r~~[Reliability](#) ~~s~~[Standards](#) are based on certain reliability principles that define the foundation of reliability for the North American [BPSBES](#). Each [Reliability](#) Standard shall enable or support one or more of the reliability principles, thereby ensuring ~~that~~ it serves a purpose in support of reliability of the North American [BPSBES](#). Each [Reliability](#) Standard shall also be consistent with all of the reliability principles, thereby ensuring ~~that~~ no [Reliability](#) Standard undermines reliability through an unintended consequence.

While NERC ~~r~~[Reliability](#) ~~s~~[Standards](#) are intended to promote reliability, they must at the same time accommodate competitive electricity markets. Reliability is a necessity for electricity markets, and robust electricity markets can support reliability. Recognizing that [BPSBES](#) reliability and electricity markets are inseparable and mutually interdependent, all [Reliability](#) Standards shall be consistent with the market interface principles. Consideration of the market interface principles is intended to ensure ~~that~~ [Reliability](#) Standards are written such that they achieve their reliability objective without causing undue restrictions or adverse impacts on competitive electricity markets.

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## III. Regional Reliability Standard Definition, Characteristics, and Elements

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### **A. Definition of a Regional Reliability Standard**

A NERC ~~r~~Reliability ~~s~~Standard defines certain obligations or requirements of entities that operate, plan, and use the ~~Bulk Power Systems BPSBES~~ of North America. The obligations or requirements must be material to reliability and measurable. Each obligation and requirement shall support one or more of the stated reliability principles and shall be consistent with all of the stated reliability and market interface principles in the NERC Standards Processes Manual.

SPP RE may develop, through the process described in this ~~M~~manual, separate SPP ~~RE~~ Regional ~~Reliability~~ Standards that go beyond, add detail to, or implement NERC ~~r~~Reliability ~~s~~Standards, or that cover matters not addressed in NERC ~~continent-wide-r~~Reliability ~~s~~Standards. SPP ~~RE~~ Regional Reliability Standards may be developed and exist separately from NERC ~~continent-wide-r~~Reliability ~~s~~Standards, or may be proposed as NERC ~~r~~Reliability ~~s~~Standards.

~~Standards~~ SPP ~~RE~~ Regional Reliability Standards that exist separately from NERC ~~r~~Reliability ~~s~~Standards shall be more stringent than a NERC ~~continent-wide-r~~Reliability ~~s~~Standard, including a regional difference that addresses matters that the NERC ~~continent-wide-r~~Reliability ~~s~~Standard does not, or shall be based on a regional difference necessitated by a physical difference in the ~~bulk power system BPSBES~~. ~~These SPP r~~Regional ~~r~~Reliability ~~s~~Standards, if approved by the SPP RE Trustees, are forwarded to NERC for review and approval and ~~submitted~~ to FERC for approval.

### **B. Definition of SPP Criteria**

SPP Criteria are requirements used by SPP members for purposes others than those specified for ~~SPP Regional Reliability Standard~~ SPP ~~RE~~ Regional Reliability Standards. SPP Criteria are enforceable only under the terms and conditions of the SPP Membership Agreement. SPP Criteria may be developed in accordance with SPP Bylaws outside the process described within this ~~M~~manual, since these ~~e~~Criteria are not intended to be used by the SPP Regional Entity for compliance and enforcement under ~~the-its~~ authority delegated ~~under-by~~ the NERC—SPP *Regional Delegation Agreement*.

### **C. Characteristics of a Regional Reliability Standard**

~~SPP RE Regional Reliability~~ Standards define obligations or requirements for the operation and planning of interconnected systems and market interface practices that will be enforceable under ~~the SPP RE's~~ authority. The format and process defined by this ~~M~~manual applies to all ~~Standards~~ SPP ~~RE~~ Regional Reliability Standards.

A ~~r~~Regional Standard shall have the following characteristics:

- **Material to Reliability** - A ~~Regional Reliability~~ Standard shall be material to the reliability ~~of the bulk power systems BPSBES~~ of the RE's region. If the reliability of the ~~bulk power systems BPSBES~~ could be compromised without a particular ~~Regional Reliability s~~Standard or by a failure to comply with that ~~Regional Reliability s~~Standard, ~~then~~ the ~~Regional Reliability s~~Standard is material to reliability.

- **Measurable** – A [Regional Reliability](#) Standard shall establish technical or performance requirements that can be practically measured.
- **Relative to NERC Reliability Standards** - A [Regional Reliability](#) Standard must go beyond, add detail to, or implement NERC [Reliability Standards](#), or cover matters not addressed in NERC [Reliability Standards](#).

### **D. Elements of a Regional Reliability Standard**

A ~~RE~~ [Regional Reliability](#) Standard shall consist of the elements identified in this section of this ~~M~~ manual. These elements are intended to apply a systematic discipline in the development and revision of [Regional Reliability](#) Standards. This discipline is necessary to achieve [Regional Reliability Standards](#) that are measurable, enforceable, and consistent. The format allows a clear statement of the purpose, requirements, measures, and penalties for non-compliance associated with each [Regional Reliability](#) Standard. Supporting documents to aid in the implementation of a [Regional Reliability](#) Standard may be referenced by the [Regional Reliability](#) Standard but are not part of the [Regional Reliability](#) Standard itself. All mandatory requirements of a [Regional Reliability](#) Standard shall be within an element of the [Regional Reliability Standard](#).

#### *Performance Elements of a Regional Reliability Standard*

<b>Identification Number</b>	A unique identification number assigned in accordance with an administrative classification system to facilitate tracking and reference RE documentation. Format for Regional Standard Request will be: RSR-000.
<b>Title</b>	A brief, descriptive phrase identifying the topic of the <a href="#">Regional Reliability</a> Standard.
<b>Effective Date and Status</b>	The effective date of the <a href="#">Regional Reliability</a> Standard or, prior to adoption of the <a href="#">Regional Reliability</a> Standard by the RE through its own processes, the proposed effective date. The status of the <a href="#">Regional Reliability Standard</a> will be indicated as active or by reference to one of the numbered steps in the <a href="#">RE’s Regional Reliability Standards development</a> process.
<b>Purpose</b>	The purpose of the <a href="#">Regional Reliability</a> Standard. The purpose shall explicitly state what outcome will be achieved or is expected by this <a href="#">Regional Reliability</a> Standard. The purpose is agreed to early in the process as a step toward obtaining approval to proceed with the development of the <a href="#">Regional Reliability Standard</a> . The purpose should link the <a href="#">Regional Reliability Standard</a> to the relevant principle(s).
<b>Requirement(s)</b>	Explicitly stated technical, performance, and preparedness requirements. Each requirement identifies the responsible entity and the action to be performed or outcome 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. (See <i>Supporting <a href="#">References Information</a> below</i> ).
<b>Applicability</b>	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

	<p>SPP area, <del>there should be then</del> a clear identification of the portion of the <del>bulk power system</del> <del>BPS</del> <del>BES</del> to which the standard applies. Any limitation on the applicability of the <del>Regional Reliability s</del>Standard based on electric facility requirements should be described.</p>
<p><b>Risk Factor(s)</b></p>	<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 <b>High Risk Factor</b> requirement (a) is one that, if violated, could directly cause or contribute to <del>bulk power system</del> <del>BES</del> instability, separation, or a cascading sequence of failures, or could place the <del>bulk power system</del> <del>BES</del> at an unacceptable risk of instability, separation, or cascading failures; or (b) is a requirement in a planning time frame that, if violated, could <del>;</del> under emergency, abnormal, or restorative conditions anticipated by the preparations <del>;</del> directly cause or contribute to <del>bulk power system</del> <del>BES</del> instability, separation, or a cascading sequence of failures; <del>;</del> or could place the <del>bulk power system</del> <del>BES</del> at an unacceptable risk of instability, separation, or cascading failures; <del>;</del> or could hinder restoration to a normal condition.</p> <p>A <b>Medium Risk Factor</b> requirement (a) is a requirement that, if violated, could directly affect the electrical state or the capability of the <del>bulk power system</del> <del>BES</del>, or the ability to effectively monitor and control the <del>bulk power system</del> <del>BES</del>, but is unlikely to lead to <del>bulk power system</del> <del>BES</del> instability, separation, or cascading failures; or (b) is a requirement in a planning time frame that, if violated, could <del>;</del> under emergency, abnormal, or restorative conditions anticipated by the preparations <del>;</del> directly affect the electrical state or capability of the <del>bulk power system</del> <del>BES</del>; or the ability to effectively monitor, control, or restore the <del>bulk power system</del> <del>BES</del>, but is unlikely <del>;</del> under emergency, abnormal, or restoration conditions anticipated by the preparations <del>;</del> to lead to <del>BES</del> instability, separation, or cascading failures, nor to hinder restoration to a normal condition.</p> <p>A <b>Lower Risk Factor</b> 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 <del>bulk power system</del> <del>BES</del>; or the ability to effectively monitor and control the <del>bulk power system</del> <del>BES</del>; 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 <del>bulk power system</del> <del>BES</del>; or the ability to effectively monitor, control, or restore the <del>bulk power system</del> <del>BES</del>.</p>
<p><b>Measure(s)</b></p>	<p>Each requirement shall be addressed by one or more measurements. Measurements will be used to assess performance and outcomes for the purpose of determining compliance with the requirements stated above. Each measurement identifies to whom the measurement applies and the expected level of performance or outcomes required to demonstrate compliance. Each measurement shall be tangible, practical, and as objective as is practical. Measures are proxies to assess required performance or outcomes. Achieving the measures should be a necessary and sufficient indicator that the requirement was met. Each measure shall clearly refer to the requirements(s) to which it applies.</p>



*Compliance Elements of a Regional Reliability Standard*

<p><b>Compliance Monitoring Process</b></p>	<p>The following compliance elements, which are part of the <a href="#">Regional Reliability sStandard</a> and are balloted with the <a href="#">Regional Reliability sStandard</a>, are developed for each measure by the NERC compliance program in coordination with the standard drafting team (<a href="#">SDT</a>):</p> <ul style="list-style-type: none"> <li>• <del>The s</del><a href="#">Specific</a> data or information required to measure performance or outcomes.</li> <li>• <del>The e</del><a href="#">Entity</a> responsible for providing the data or information for measuring performance or outcomes.</li> <li>• <del>The p</del><a href="#">Process</a> used to evaluate data or information for assessing performance or outcomes.</li> <li>• <del>The e</del><a href="#">Entity</a> responsible for evaluating data or information to assess performance or outcomes.</li> <li>• <del>The t</del><a href="#">Time</a> period in which performance or outcomes is measured, evaluated, and then reset.</li> <li>• Measurement data retention requirements and assignment of responsibility for data archiving.</li> </ul>
<p><b>Violation Severity Levels</b></p>	<p>Defines the degree to which compliance with a requirement was not achieved. The violation severity levels; are part of the <a href="#">Regional Reliability sStandard</a> and are balloted with the <a href="#">Regional Reliability sStandard</a>, and are developed by the NERC compliance program in coordination with the <del>standard drafting team</del><a href="#">SDT</a>.</p>

*Supporting Information Elements*

<p><b>Interpretations</b></p>	<p>Formally approved interpretations of the <a href="#">Regional rReliability sStandard</a>. Interpretations are temporary, as the standard should be revised to incorporate the interpretation. Interpretations are developed and approved through <del>a process described in the section Interpretations of Standards</del> <a href="#">the Regional Reliability Standards Process steps outlined in Section V., Part B of this Manual</a>.</p>
<p><b>Implementation Plan</b></p>	<p>Each <a href="#">Regional Reliability sStandard</a> shall have an associated implementation plan describing the effective date of the <a href="#">Regional Reliability sStandard</a> or effective dates if there is a phased implementation. The implementation plan may also describe the implementation of the <a href="#">Regional Reliability sStandard</a> in the compliance program and other considerations in the initial use of the <a href="#">Regional Reliability sStandard</a>, such as necessary tools, training, etc. The implementation plan must be posted for at least one public comment period and is approved as part of the ballot of the <a href="#">Regional Reliability sStandard</a>.</p>
<p><b>Supporting References</b></p>	<p>This section references related documents that support reasons for, or otherwise provide additional information related to, the <a href="#">Regional Reliability Standard</a>. Examples include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Development history of the <a href="#">Regional Reliability Standard</a> and prior versions</li> <li>• Notes pertaining to implementation or compliance</li> <li>• <a href="#">Regional Reliability Standard</a> references</li> <li>• <a href="#">Regional Reliability Standard</a> supplements</li> <li>• Procedures</li> <li>• Practices</li> <li>• Training references</li> <li>• Technical references</li> </ul>

- White papers
- Internet links to related information

## IV. Roles in the [SPP RE Regional Reliability Standards Development Process](#)

~~Any member of NERC (including any member of a regional reliability organization, Regional Entity, or group within NERC) shall be allowed to request that a Standard be developed, modified, or withdrawn. Additionally, Any entity (person, organization, company, government agency, individual, etc.) who that is directly and materially affected by the reliability of the North American within the SPP RE or SPP RTO Bulk Power Systems BES region shall be allowed to request a SPP RE Regional Reliability Standard be developed, modified, or withdrawn/retired.~~

**Originator** - Any entity (person, organization, company, governmental agency, individual, etc.) ~~that is directly and materially affected by within the SPP RE or SPP RTO region BPS/BES the operation of an RE's BPS,~~ is allowed to request a ~~Standard~~ [SPP RE Regional Reliability Standard](#) be developed or an existing ~~Standard~~ [SPP RE Regional Reliability Standard](#) be modified, or ~~deleted/retired.~~

**Registered ballot body** -— The registered ballot body comprises all entities or individuals that qualify for one of the voting segments and are registered with SPP [RE](#) as a ballot participant ~~in the voting of to vote on~~ a proposed [SPP RE Regional Reliability sStandard](#). Membership in SPP is not a requirement for registration.

Registration in a ballot body must be ~~completed done via the SPP website~~ by close of business the day ~~prior to the day before~~ voting begins ~~on the proposed SPP RE Regional Reliability sStandard action.~~ Each [SPP RE Regional Reliability sStandard](#) action has its own registered ballot body. The representation model of the registered ballot body is provided in *Sec V. Part B. (~~SPP RE Regional Reliability Standards Development Process Steps, Step 5-6 – Open Voting~~)*. The outcome of the vote of the registered ballot body is forwarded to the [SPP RE](#) Trustees regardless of advisory voting outcomes at the MOPC or SPP Board level.

**SPP Regional Entity Trustees (SPP RE Trustees)** – The ~~SPP RE Regional Entity~~ Trustees shall act on any proposed ~~Standard~~ [SPP RE Regional Reliability Standard](#) that has gone through the process contained in this ~~M~~ manual. Upon approval by the [SPP RE](#) Trustees, the ~~Standard~~ [SPP RE Regional Reliability Standard](#) will be submitted to NERC for approval ~~under the ERO.~~ [SPP RE](#) Trustees are ~~notified of all proposed SPP RE Regional Reliability sStandards requests and receive progress reports from the SPP RE Staff staff.~~ They also receive notice of the outcome of votes by the ballot body and any ~~advisory~~ recommendations and reports on proposed [SPP RE Regional Reliability sStandards](#) made by the ~~Standards Drafting Team (SDT)~~ [SDT, Markets and Operations Policy Committee](#) (MOPC) and SPP Board.

**Regional Entity Staff (RE Staff staff)** -— [SPP RE Staff staff](#) shall support the ~~RE Trustees~~ [SPP RE Trustees](#) in their oversight authority over the [Regional Reliability Standards Development Process](#) and any other function or responsibility ascribed to them in the ~~NERC- Southwest Power Pool, Inc. SPP Delegation Agreement.~~

**SPP Markets and Operations Policy Committee (MOPC)** – ~~If Accepted in Step 1, the SPP Markets and Operations Policy Committee~~MOPC will assign SPP RE Regional Standards requests to a ~~Standards Development Team~~SDT for development, ~~or revision, or retirement withdrawal.~~

**SPP Board of Directors and Members Committee (BOD/MC)** – The ~~SPP Board of Directors, in conjunction with the~~SPP Members Committee,BOD/MC provides advisory votes to the SPP RE Trustees on reliability matters as they pertain to ~~SPP the~~RE. The BOD/MC votes on proposed SPP RE Regional Reliability sStandards or changes to SPP RE Regional Reliability sStandards for the sole purpose of providing an additional stakeholder forum for review; and valuable input to the SPP RE Trustees’ decision on a SPP RE Regional Reliability sStandard, based on the BOD/MCgroups’s expertise on reliability, operations, and market matters, as well as its wide diverse representation of the SPP membership.

**Compliance Director** – The SPP RE office-staff responsible for the administration of the SPP RE Compliance Monitoring and Enforcement Program. ~~The duties of this office~~This staff member’s duties includes but are not limited to; providing inputs and comments during the SPP Regional Reliability sStandards development process to ensure the measures will be effective and can be practically implemented.

**Standard Drafting Team (SDT)** – ~~Usually an~~Appointed by an existing SPP working group or task foree, Aan SDT that is comprised of technical experts that work cooperatively in the development and modification of SPP RE Regional Reliability Standards in accordance with the processes defined in this Manual. Any interested party may ~~attend~~participate in meetings, ~~and~~ provide input and comments; ~~and vote on the proposed SPP RE Regional Standard~~ under provisions of the SPP RE Regional Standards Development Process Manual. ~~However, Only SDT members may vote on SDT actions and decisions outside of the open voting process (Step 6).~~

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## V. SPP RE Regional Reliability Standards Development Process

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### A. Assumptions and Prerequisites

The process for developing and approving [SPP RE Regional Reliability Standards](#) is similar to procedures accredited by the American National Standards Institute (ANSI), like that employed by the North American Energy Standards Board (NAESB). The [SPP RE Regional Reliability Standards](#) development process has the following characteristics:

- **Inclusive** - Any [entity](#) (~~person, organization, company, governmental agency, individual, etc.~~) representing an organization ~~with a direct and material interest in the SPP RE or SPP RTO region BES~~ has a right to participate by:
  - a) Expressing an opinion and its basis,
  - b) Having that position considered,
  - c) Voting on a proposed SPP ~~RE~~ Regional ~~R~~Reliability ~~s~~Standard through a segment weighted balanced process, and
  - d) Appealing any negative decision
- **Openness** - Participation is open to all ~~organizations/entities~~ that are ~~within the directly and materially affected by SPP the RE's or RTO's BPSBES regionreliability~~. There shall be no undue financial barriers to participation. Participation shall not be conditioned upon membership in ~~SPP or registration with SPPthe~~ RE, and shall not be unreasonably restricted on the basis of technical qualifications or other such requirements. Meetings of SDT's are open to all interested parties and are noticed on the [public](#) SPP website at least ~~15~~[seven](#) days in advance. Since pre-existing SPP committees, working groups, or task forces may ~~be assigned the responsibilities of~~ [serve as the base for](#) a SDT, the agenda for ~~these organizational group~~ meetings will note that an SDT activity is being undertaken to distinguish such activity from other non-SDT related agenda items. The openness provisions of this ~~M~~manual apply only and explicitly to the SDT activities. Meetings of subcommittees and working groups serving as a SDT shall follow the SPP Bylaws Sec 3.5 Meetings.
- **Balance** - The [SPP RE Regional Reliability Standards](#) ~~d~~Development ~~p~~Process strives to have an appropriate balance of interests. The process prevents any two voting sectors from dominating voting outcomes and no single voting sectors from defeating a proposed [SPP RE Regional R](#)reliability standard.
- **Due Process** – The SPP [RE](#) Regional Reliability Standards Development Process provides reasonable notice and opportunity for public comment. At ~~the a~~ minimum, the procedure shall include public notice of the intent to develop a standard, a public comment period on the proposed standard, due consideration of those public comments, and a ballot of interested stakeholders.

**Transparent** – All actions material to the development of an [SPP RE R](#)Regional ~~R~~Reliability ~~s~~Standard shall be transparent. All ~~standards development team (SDT)~~ meetings shall be open

and publicly noticed on the [public SPP](#) website.

[SPP RE staff will communicate about SPP RE Regional Reliability Standards under development using the customary communication procedures and processes then in place, including but not limited to: posting documents to the public SPP website, publishing newsletter articles, making announcements at SPP organizational group meetings, and sending notifications to SPP public email exploder lists such as the MOPC, Board of Directors, RE Trustees, and RE Standards Development lists. Interested parties may subscribe to public exploder lists via the SPP public website or by contacting the SPP customer relations department.](#)

## **B. SPP RE Regional Reliability Standards Development Process Steps**

**Notes:** The term “days” below refers to calendar days. [The following process steps apply to developing, revising, or retiring an SPP RE Regional Reliability Standard.](#)

### **Step 1 – Request to Develop, Revise or ~~Delete~~ Retire a SPP RE Regional Reliability Standard**

Any ~~individual representing an organization (Originator) entity that is directly or materially impacted by the operation of the BPSBES~~ within the geographical footprint of ~~the SPP RE or SPP RTO region~~ may submit a request to the ~~Markets and Operations Policy Committee (MOPC)~~ for the development, modification, or deletion of a ~~an RE Standard~~ [SPP RE Regional Reliability Standard](#). Any such request shall be submitted to the MOPC Chairman, or his/her designee, or by another process as otherwise posted on the [public SPP](#) website. The request should be made using the [SPP RE Regional Standard Request Form \(RSR\)](#) in Appendix B.

The MOPC or a designee will work with the Originator to develop a description of the proposed ~~Standard~~ [SPP RE Regional Reliability Standard](#)'s subject matter containing sufficient detail to clearly define the purpose, scope, impacted parties, and other relevant information related to the proposed ~~Standard~~ [SPP RE Regional Reliability Standard](#).

[Following the development of a request, the MOPC may take one of the following actions:](#)

- [Remand the request back to the Originator for additional work and information.](#)
- [Accept the request as a candidate for a new or revised regional standard.](#)
- [Reject the request. If the MOPC rejects a request, it will provide a written explanation for rejection to the Originator and the RE Trustees within 30 days of the rejection decision.](#)

[If rejected by MOPC, the RE Trustees may accept MOPC's decision or move it forward for consideration \(Step 2\).](#)

### **Step 2 – Notification to Regional Entity Trustees & Public Notice**

[Once accepted as a candidate for a new or revised SPP RE Regional Reliability Standard, the Chairman of the MOPC or his/her designee will forward the request to the SPP RE Trustees. SPP RE staff will also post the request on the public SPP website for public notice and may utilize any](#)

~~appropriate SPP email distribution lists within 30 day~~ customary communication procedures then in effect. The request is not to be judged as appropriate or useful at this stage.

### **Step 3 – Standard Drafting Team Formation**

~~The MOPC will assign the drafting and scoping responsibility to an appropriate SPP Working Group or Task Force. This group will become the Standards Drafting Team (SDT) for this particular Standard request.~~

For each new SPP RE Regional Reliability Standard request, MOPC will use the customary communication procedures and processes then in effect to request that interested parties who wish to serve on the SDT submit their names and qualifications to MOPC. The request will also be posted on the public SPP website. MOPC will establish a 30-day window for submittal of nominations. MOPC will then appoint to the SDT individuals with the necessary technical expertise. SDT membership shall not be conditioned upon membership in SPP or registration with SPP RE. If the open nominations process does not solicit enough SDT members, MOPC may assign the request to an existing working group.

The MOPC's assignment to the SDT will include any necessary deadlines and due dates for the proposed Standard~~SPP RE Regional Reliability Standard~~.

Any documentation of the deliberations of the SDT concerning the proposed Standard~~SPP RE Regional Reliability Standard~~ shall be made available in accordance with the SPP Bylaws requirements for meeting and organizational groups then in effect. Meetings of the SDT are open to any interested party, but only SDT members may vote on SDT actions and decisions outside of the open voting process (Step 6). Meeting dates and actions on the proposed SPP RE Regional Reliability Standard are publicly noticed on the public SPP's public website.

The SDT shall provide a report to the SPP RE Trustees and the MOPC on a periodic basis (at least at every regularly scheduled meeting) noting the status of the proposed SPP RE Regional Reliability Standard that has been assigned to it for consideration.

### **Step 3-4 – Scoping and Drafting**

The SDT will draft the language of the proposed SPP RE Regional Reliability Standard per the ~~Standard~~ description provided by the MOPC and the Originator. The SDT may recommend changes to the scope, purpose, need or other relevant aspects of the proposed SPP RE Regional Reliability Standard, including termination of the proposed SPP RE Regional Reliability Standard, through consultation with the MOPC.

The SDT will develop~~s~~ a work plan for completing the proposed Standard~~SPP RE Regional Reliability Standard~~ development work, including the establishment of milestones for completing critical elements of the work in sufficient detail to ensure that the SDT will meet the date objective in the assignment, or an alternative date. This plan will be provided to the SPP RE Trustees and the MOPC.



The SDT may meet in person or via electronic means as necessary; ~~;~~ may establish sub-work teams (made up of members of the SDT) as necessary; ~~;~~ and may perform other activities to address the parameters of the proposed Standard~~SPP RE Regional Reliability Standard~~ and the established milestone date(s).

The SDT should consider:

- The impact of the proposed Standard~~SPP RE Regional Reliability Standard~~ on neighboring regions; and seek appropriate input from the neighboring regions if the proposed SPP Standard~~SPP RE Regional Reliability Standard~~ is determined to have such an impact.
- An implementation plan, including the nature, extent and duration of field-testing, if any.
- The need for any existing proposed Standard~~SPP RE Regional Reliability Standard~~ to be ~~deleted~~retired, in part or whole, or otherwise impacted by the implementation of the draft proposed Standard~~SPP RE Regional Reliability Standard~~.
- Technical reports, white papers and/or work papers that provide technical support for the draft-proposed Standard~~SPP RE Regional Reliability Standard~~ under consideration.
- Documenting the perceived reliability impact should the proposed Standard~~SPP RE Regional Reliability Standard~~ be approved.

The SDT will regularly (at least at every regularly scheduled meeting) report to the SPP RE Trustees and the MOPC on its progress in meeting a timely completion of the draft proposed Standard~~SPP RE Regional Reliability Standard~~. The SDT may request consideration of scope changes or termination of the proposed Standard~~SPP RE Regional Reliability Standard~~ at any point in the SPP RE Regional Reliability Standard development process.

The SPP RE Trustees or the MOPC may; at any time direct the SDT move to Step 45-Public Comments and post for comment the current work product, or ~~to terminate the~~ activity if there is no further need for the proposed Standard~~SPP RE Regional Reliability Standard~~. If the activity is terminated, SPP RE Staff-staff will notify the Originator and the SPP RE Trustees within 30 days.

If there are competing drafts, all will be posted on the public SPP website for comment. The MOPC may take this step at any time after a SDT has been commissioned to develop the proposed Standard~~SPP RE Regional Reliability Standard~~.

For proposed Standard~~SPP RE Regional Reliability Standards~~ in progress, the MOPC must take action to move to Step 45-Public Comments; or ~~to~~reject the proposal. If the MOPC votes to terminate the activity, the SPP RE Trustees must be notified with supporting reasons provided to them. The proposed SPP Regional Reliability sStandard would then go directly to Step 11. (~~See Step 11-12 -- SPP RE Trustees Action~~).

### **Step 4-5 – Post Draft for 30 Day Public Comments**

SPP RE Staff will post the draft of the proposed Standard~~SPP RE Regional Reliability Standard~~ on the public SPP website, along with any supporting documents, for a 30-day comment period. SPP RE Staff shall also inform Registered entities and other potentially interested stakeholders of the posting using the customary communication procedures and processes then in effect~~available SPP communication resources, or by other means deemed appropriate~~. Comments may be submitted using the RSR Comment Form in Appendix B, also available on the public SPP ~~public internet~~ website.

Within 30 days of the conclusion of the 30-day comment ~~posting~~ period, the SDT shall convene and consider the written views and objections of all participants as they relate ~~changes~~ to the draft proposed Standard~~SPP RE Regional Reliability Standard~~, the implementation plan, and/or supporting technical documents. ~~The SDT may elect to return to Step 3. Scoping and Drafting to revise the draft Standard, and/or any supporting documentation.~~ The SDT shall summarize ~~prepare a summary of~~ the comments received and any changes made as a result of the comments. ~~The summary, along with a response to each comment received, will be posted on the SPP website no later than the next posting of the proposed standard. This summary will be and posted on the SPP website when completed.~~ Following its consideration of comments, the SDT may elect to return to Step 4 Scoping and Drafting to further revise the proposed SPP RE Regional Reliability Standard and/or any supporting documentation.

### **Step 5-6 – Open Voting**

The SDT shall direct SPP~~the~~ RE Staff to post the revised draft proposed Standard~~SPP RE Regional Reliability Standard~~ and other relevant documents, including but not limited to, the ; implementation plan, supporting technical documentation, and summary of comments.

#### **First Ballot**

SPP RE staff will schedule a vote by interested parties to commence no sooner than 15 days and no later than 30 days following the posting of the revised draft. Ballot body registration will begin the day the revised draft is posted. Interested parties may register for the ballot body over a period of 15 days. The 15-day ballot body registration will be followed by a 15-day voting period. At least 15 days prior to the start date of the voting ballot, SPP RE staff will use the customary communication procedures and processes then in effect to notify interested parties of the ballot body registration period and the voting period and will post the notification on the public SPP website.

~~Members of the Registered ballot body members shall be allowed to vote over a period of 15 days; V~~otes must be submitted by close of business on the final day of the voting period. Voting will be through electronic means or other means provided by SPP.



**SPP Segment Weighted Voting Registration in a ballot body created for a specific proposed regional standard is required to vote. Registration for a proposed Standard is noticed on the SPP website and through a Standards email exploder for a period of 15 days prior to the start of the ballot (subscription to the Standards email exploder is open to any interested party through the SPP website). All interested parties who register with the ballot body may vote on the proposed new Standard, Standard revision or Standard deletion. An interested party may only register in one segment.**

Entities within the SPP RE or SPP RTO region may participate in the voting process. To vote on a proposed SPP RE Regional Reliability Standard, an entity must register in a ballot body created for that specific draft of the proposed SPP RE Regional Reliability Standard. Registration must be submitted by close of business on the final day of the ballot body registration period. The registered ballot body comprises all entities or individuals that qualify for one of the SPP RE Regional Reliability Standards segments and are registered with SPP RE as a ballot body participant. A registered ballot body participant cannot change segments during a balloting period once the participant has cast a vote or designated a proxy. When registering for a subsequent ballot(s) of the same proposed SPP RE Regional Reliability Standard, an entity cannot change the segment for which it previously registered.

The five SPP voting segments for Regional Reliability Standards are:

- 1) Transmission
- 2) Generation
- 3) Marketer/Broker
- 4) Distribution/Load Serving Entity
- 5) End User and Public Interest

Any entity that can meet any one of the segment qualifications below is entitled to register and vote in that segment. Only one vote per entity per segment is permitted. For purposes of SPP RE Regional Reliability Standard ballot body registration and voting, an entity is defined as an individual or organization that has a separate legal identity. Affiliates (subsidiary, parent, or sibling corporations) shall be treated as one entity except in instances where the affiliates are separately registered in the NERC Compliance Registry, in which case the affiliates may be treated as separate entities. Entities registered in multiple regions will not be able to register on behalf of more than one regional registration.

The segment qualifications are as follows (only one of the segment qualifications must be met):

**1) Transmission**

- a. Any entity within the SPP RE or SPP RTO region that owns and maintains transmission facilities
- b. Any entity within the SPP RE or SPP RTO region responsible for the reliability of its local transmission system and operates or directs the operations of the transmission facilities
- c. Any entity within the SPP RE or SPP RTO region that develops a long-term (generally one year and beyond) plan for the reliability (adequacy) of the interconnected bulk electric transmission systems within its portion of the PA area

- d. Any entity within the SPP RE or SPP RTO region that administers the transmission tariff and provides transmission service to transmission customers under applicable transmission service agreements
- e. Any entity within the SPP RE or SPP RTO region that coordinates and integrates transmission facility and service plans, resource plans, and protection systems
- f. Any entity within the SPP RE or SPP RTO region that is responsible for the reliable operation of the BES, has the wide area view of the BES, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations

## **2) Generation**

- a. Any entity within the SPP RE or SPP RTO region that owns and maintains generating units, including variable and other renewable resources
- b. Any entity within the SPP RE or SPP RTO region that operates generating unit(s) and performs the functions of supplying energy and interconnected operations services
- c. Any entity within the SPP RE or SPP RTO region that integrates resource plans ahead of time, maintains load-interchange-generation balance within a BA area, and supports Interconnection frequency in real-time
- d. Any entity within the SPP RE or SPP RTO region that authorizes implementation of valid and balanced Interchange Schedules between Balancing Authority Areas, and ensures communication of Interchange information for reliability assessment purposes
- e. Any entity within the SPP RE or SPP RTO region that coordinates and integrates transmission facility and service plans, resource plans, and protection systems
- f. Any entity within the SPP RE or SPP RTO region that purchases or sells and takes title to energy, capacity, and interconnected operations services
- g. Any entity within the SPP RE or SPP RTO region that is responsible for the reliable operation of the BES, has the wide area view of the BES, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations
- h. Any entity within the SPP RE or RTO region that develops a long-term (generally one year and beyond) plan for the resource adequacy of specific loads (customer demand and energy requirements) within a planning authority area

## **3) Marketer/Broker**

- a. Any entity within the SPP RE or SPP RTO region serving end-use customers under a power marketing agreement or other authorization not classified as a regulated tariff
- b. Any entity within the SPP RE or SPP RTO region that buys, sells, or brokers energy and related services for resale in wholesale or retail markets, whether a non-jurisdictional entity operating within its charter or an entity licensed by a jurisdictional regulator
- c. Any entity within the SPP RE or SPP RTO region that is a Generation and Transmission (G&T) cooperatives or joint-action agency that performs an electricity broker, aggregator, or marketer function
- d. Any entity within the SPP RE or SPP RTO region that is an agent or associations that represents groups of electricity brokers, aggregators, or marketers

- a. Any entity within the SPP RE or SPP RTO region that is a demand-side management provider
- e.

#### **4) Distribution/Load Serving Entity**

- a. Any entity within the SPP RE or SPP RTO region that provides and operates the “wires” between the transmission system and the end-use customer
- b. Any entity within the SPP RE or SPP RTO region that secures energy and transmission service (and related interconnected operations services) to serve the electrical demand and energy requirements of its end-use customers
- c. Any entity within the SPP RE or SPP RTO region that purchases or sells and takes title to energy, capacity, and interconnected operations services

#### **5) End User and Public Interest**

- a. Any entity within the SPP RE or SPP RTO region with service delivery taken that is not purchased for resale
- b. Any governmental entity or agency within the SPP RE or SPP RTO region, including public utility commissions
- c. An entity within the SPP RE or SPP RTO region that qualifies for registration in another segment may not register in the End User/Public Interest segment. Any individual currently employed by an entity that is eligible to join one or more of the other segments shall not be qualified to join the End User/Public Interest segment.

SPP RE Staff will accept votes any time during the 15-day ballot period for the draft proposed Standard SPP RE Regional Reliability Standard. Votes must be submitted by close of business on the final day of the ballot period. Votes will be counted by voting segment. Each voting segment will receive 20% of the vote, unless there are less than five votes in the segment and then the segment vote will be adjusted as provided for below. A weighted vote of 2/3 affirmative of those voting will pass a Standard for further consideration (Step 7).

#### **Criteria for Ballot Pool Approval**

For a Regional Reliability Standard action to be approved by the ballot body and passed on for further consideration (Step 78- Post Draft Standard for Action on the MOPC Agenda) the following is required:

- A quorum of registered ballot body members, which is established by -at least 75% of the members of the registered ballot body casting a ballot, whether that ballot is affirmative, negative, or an abstention. A quorum is not reached when 75% of the registered ballot body is equal to or less than three; and
- A two-thirds (66.67%) 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.

The following process will be used to determine if there are sufficient affirmative votes for ballot body approval:

- For each segment with five or more votes, the number of affirmative votes shall be divided by the sum of affirmative and negative votes to determine the fractional vote for the segment. This resulting fractional percentage shall be carried forward to the combined total of affirmative votes for all segments; the negative votes shall be tallied in the same manner and shall be carried forward in the combined total of negative votes for all segments. Abstentions and non-responses shall not be counted in the segment's fractional affirmative or negative vote.
  - For each segment with less than five votes, the segment's vote weight shall be proportionally reduced. Each affirmative or negative vote (excluding abstentions and non-responses) within that segment shall receive a weight of 20% of the segment vote (.20) within the appropriate vote column (affirmative or negative). The fractional sum total for each of the columns, affirmative and negative, shall be carried forward to the combined total of affirmative and negative votes for all segments.
- The result of the total fractional sum of affirmative votes combined from all voting segments, divided by the total fractional sum of total affirmative and negative votes from all voting segments, shall be the percentage used to determine if the ballot has attained a two-thirds (66.67%) needed for ballot body approval of the SPP RE Regional Reliability Standard action and to be moved on for further consideration.

If the vote fails to achieve ~~the required a 2/3~~two-third majority of those voting as provided for herein, the ~~proposed Standard~~SPP RE Regional Reliability Standard will be returned to the SDT for consideration for future action (*Step 34- Scoping and Drafting*). The SDT may: ~~revise the proposed Standard~~revise the SPP RE Regional Reliability Standard; ~~post the Standard-draft proposed SPP RE Regional Reliability Standard~~again for comments; ~~reballot the proposed Standard~~reballot the SPP RE Regional Reliability Standard; ~~ask the SPP RE Trustees to terminate the request~~; or take any other action it deems appropriate.

In the event that the proposed SPP RE Regional Reliability Standard receives the required two-third majority of those voting but also receives negative votes with comments during the ballot period, those comments shall be addressed in accordance with Step 5 and included with a re-circulation ballot.

### **Recirculation Ballot**

In the recirculation ballot, members of the ballot body shall again be presented the proposed standard (unchanged from the first ballot) along with the reasons for negative votes, the SDT responses, and any resolution of the differences.

All members of the ballot body eligible to vote shall be permitted to reconsider and change their vote from the first ballot. Eligible voting members of the ballot body that did not respond to the first ballot shall be permitted to vote in the recirculation ballot. Only one vote will be accepted from each entity within a segment.

In the recirculation ballot, votes will be counted by exception only - members on the recirculations ballot may indicate a revision to their original vote, otherwise their vote shall remain the same as in

the first ballot. If a recirculation ballot is conducted, the results of the recirculation ballot shall determine the status of the standard, regardless of the outcome of the first ballot.

The voting time window for the recirculation ballot is ten (10) days. The 15-day posting is not required for the recirculation ballot. Members of the ballot body may submit comments in the recirculation ballot but no response to those comments is required.

The SPP RE Trustees are notified of the outcome of the vote(s) and any actions taken by the SDT as a result of the vote(s). The SPP RE Trustees will determine any additional action to be taken. (See ~~Step 12~~ SPP RE Trustees Action.)

### **Step 6-7 – Prepare Consensus Draft & Minority Report**

When a draft of the proposed Standard~~SPP RE Regional Reliability Standard~~ is approved by the SPP RE Regional Reliability Standard registered ballot body, the SDT will ~~prepare a consensus draft representing the version of the Standard to be presented~~ the approved draft of the proposed SPP RE Regional Reliability Standard (Consensus Draft SPP RE Regional Reliability Standard) to SPP RE staff, the MOPC and the BOD/MC before final action by the SPP RE Trustees.

#### Minority Report and Appeals

A minority report will be prepared if there are ~~significant~~ issues ~~that cannot be not~~ resolved within by the SDT during the drafting phase (Step 34), ~~or~~ from the public comments (Step 45) or from the open voting process (Step 6).

- The minority report will be prepared by SPP RE staff or in coordination with the SDT. SPP RE staff may work in conjunction with the dissenting parties to prepare the report.
- The minority report will include a summary of comments that were rejected by the SDT during the development of the proposed SPP RE Regional Reliability Standard and the reason(s) that these comments were rejected, in part or whole.
- A minority report will include any appeals from interested parties that the SPP RE Regional Standards Development Process Procedure Manual ~~was~~ violated in the development of the proposed Standard~~SPP RE Regional Reliability Standard~~.
- The minority report will remain a part of the record of the proposed Standard~~SPP RE Regional Reliability Standard~~ and will be available to any interested party during any subsequent steps.
- The eConsensus ~~d~~Draft SPP RE Regional Reliability Standard and any minority reports will be presented to the MOPC for its consideration and an advisory vote.

### **Step 7-8 – Post Draft Standard for Action on the MOPC Agenda**

~~A~~ The recommended Consensus Draft SPP RE Regional Reliability Standard ~~Standard will be~~ is noticed for consideration on the MOPC agenda. The agenda materials will be ~~are~~ made available per the SPP Bylaws, Section 3.5. If a Consensus Draft Standard~~SPP RE Regional Reliability Standard~~

requires consideration by the MOPC prior to a regularly scheduled meeting, ~~SPP the~~ RE ~~s~~Staff will notify the MOPC Chairman, who will notice a special meeting in accordance with the SPP Bylaws.

### **Step 8-9 – MOPC Review**

The MOPC will provide an advisory vote on the ~~Consensus Draft Standard~~SPP RE Regional Reliability Standard under the governance provisions of the SPP Bylaws, Section 3.9--Voting. If the MOPC opposes the ~~Consensus Draft Standard~~SPP RE Regional Reliability Standard, the MOPC may request revision of the ~~Consensus Draft Standard~~SPP RE Regional Reliability Standard or termination of further activity on the ~~proposed Standard~~SPP RE Regional Reliability Standard. If the ~~proposed Standard~~SPP RE Regional Reliability Standard is terminated, notice ~~will be is~~ provided ~~(described in Step 9)~~ to the SDT, SPP RE staff, and SPP RE Trustees for further action (~~Step 11~~12). If further revision is requested by the MOPC, the Consensus Draft SPP RE Regional Reliability Standard will be remanded back to the SDT with comments from the MOPC.

The MOPC shall be provided:

- The Consensus Draft SPP RE Regional Reliability Standard and any modification or deletion of other related existing SPP RE Regional Reliability Standard(s)
- Implementation Plan (including recommended field testing and effective dates)
- Technical documentation supporting the Consensus Draft SPP RE Regional Reliability Standard
- A summary of the registered ballot body vote and summary of the comments and responses that accompanied the votes, including a Minority Report if applicable

If the MOPC concurs with the ~~Consensus Draft Standard~~SPP RE Regional Reliability Standard, the ~~Consensus Draft Standard~~SPP RE Regional Reliability Standard will proceed to the SPP Board of Directors and Members Committee for review (~~Step 10~~109-SPP RE Trustees Action).

The ~~SPP~~ RE Trustees ~~will be re~~ notified of the outcome of the MOPC review.

### **Step 9-10 – SPP Board of Directors/Members Committee Review**

A ~~draft~~Consensus Draft StandardSPP RE Regional Reliability Standard submitted to the SPP Board of Directors/Members Committee (BOD/MC) for review must be publicly posted at least ~~10~~seven days prior to consideration by the BOD/MC. The BOD/MC may consider the ~~Consensus Draft Standard~~SPP RE Regional Reliability Standard at a regularly scheduled meeting, or as determined by the Chairman of the BOD/MC.

The BOD/MC shall be provided:

- The ~~e~~C~~d~~Draft StandardSPP RE Regional Reliability Standard and any modification or deletion of other related existing ~~Standard~~SPP RE Regional Reliability Standard(s)
- Implementation Plan (including recommended field testing and effective dates)
- Technical ~~D~~Documentation supporting the ~~Consensus d~~C~~Draft Standard~~SPP RE Regional Reliability Standard

- A summary of the registered ballot body vote and summary of the comments and responses that accompanied the votes, including a Minority Report if applicable.
- The results of the MOPC advisory vote and any comments
- Any other information relevant to the [proposed Standard SPP RE Regional Reliability Standard](#)

The BOD/MC will:

- Provide an advisory vote to the ~~RE Trustees~~[SPP RE Trustees](#) on the [Consensus Draft Standard SPP RE Regional Reliability Standard](#) (~~Step 1011- Presentation to SPP RE Trustees~~); or
- Return the [Consensus Draft Standard SPP RE Regional Reliability Standard](#) to the MOPC with comments

In the case of a second return of a [proposed Standard SPP RE Regional Reliability Standard from the BOD/MC to MOPC](#), the proposed [Standard SPP RE Regional Reliability Standard](#) ~~is~~ will be forwarded to the [SPP RE Trustees](#) for action: (~~The proposed Standard would go directly to Step 121-SPP RE Trustees Action~~).

### **Step 10-11 – Presentation to SPP RE Trustees**

A [Consensus Draft Standard SPP RE Regional Reliability Standard](#) submitted to the [SPP RE Trustees](#) for action must be publicly posted at least ~~10~~[seven](#) days prior to consideration by the [SPP RE Trustees](#).

The [SPP RE Trustees](#) shall be provided:

- The ~~e~~[Consensus Draft Standard SPP RE Regional Reliability Standard](#) and any modification or deletion of other related existing [Standard SPP RE Regional Reliability Standard](#)(s)
- Implementation Plan (including recommended field testing and effective dates)
- Technical ~~D~~[documentation](#) supporting the [Consensus Draft Standard SPP RE Regional Reliability Standard](#)
- A summary of the registered ballot body vote and summary of the comments and responses that accompanied the vote including a Minority Report if applicable
- The results of the MOPC advisory vote and any [associated](#) comments
- The ~~resulted results~~ of the BOD/MC advisory vote and any [associated](#) comments
- Any other information relevant to the [proposed Standard SPP RE Regional Reliability Standard](#)

### **Step 11-12 -- SPP RE Trustees Action**

The [SPP RE Trustees](#) will:

- Recommend NERC approve the [Consensus Draft Standard SPP RE Regional Reliability Standard](#) through the NERC process; or
- Remand the [Consensus Draft Standard SPP RE Regional Reliability Standard](#) to the SDT through the MOPC with comments and instructions; or



- Determine there is no need for the Consensus Draft Standard~~SPP RE Regional Reliability Standard~~ and terminate any future activity.

The SPP RE Trustees may consider the Consensus Draft Standard~~SPP RE Regional Reliability Standard~~ at a regularly scheduled meeting, or as determined by the Chairman of the SPP RE Trustees.

If a Consensus Draft Standard~~SPP RE Regional Reliability Standard~~ is forwarded to the SPP RE Trustees for action as a result of an opposing MOPC vote (Step 89- MOPC Review), or -if automatically forwarded to them as a result of two or more returns by the MOPC or SPP Board BOD/MC (Step 109- SPP Board of Directors/Members Committee Review), the SPP RE Trustees will take definitive action, including initiating the process from Step 34- Scoping and Drafting. The SPP RE Trustees may not submit a proposed Standard~~SPP RE Regional Reliability Standard~~ to NERC for approval without a positive outcome from open and balanced voting ~~in per~~ Step 56-Open Voting.

Advisory votes of the MOPC and the BOD/MC do not impact the SPP RE Trustees' authority to submit a Consensus Draft Standard~~SPP RE Regional Reliability Standard~~ to NERC. However, the SPP RE Trustees shall give full consideration to the results of the balloting and any dissenting opinions presented within the Minority Report or opinions of the MOPC and BOD/MC.

**Step 12-13 – Submit to NERC for Approval as SPP RE Regional Reliability Standard**  
SPP RE Staff will notify interested parties of submission of a Consensus Draft Standard~~SPP RE Regional Reliability Standard~~ to NERC by the SPP RE Trustees through the customary communication procedures and processes then in effect. The SPP RE Staff will publicly notice any further steps necessary to have a Consensus Draft Standard~~SPP RE Regional Reliability Standard~~ reviewed and/or approved through the NERC ~~or any successor organization standards process~~.

### **C. Filing of Regional Reliability Standards with Regulatory Agencies**

The development of Regional Reliability Standards must be administered in coordination with ~~the~~ NERC's Standards Development- pProcessesProcedure. At the discretion of the NERC Board of Trustees, adopted Reliability Standards may be filed with applicable regulatory agencies in the United States, Canada, and Mexico. Regional Reliability Standards, once approved by FERC, are made part of the NERC Reliability sStandards and shall be enforced accordingly.



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## Appendix A

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### **I. Maintenance of [SPP RE Regional Reliability Standards Development Process Manual](#)**

Any interested party may propose changes to this ~~M~~manual. Such ~~Process-M~~manual change requests will follow all the steps of the [SPP RE Regional Reliability Standards Process](#) outlined in Section V, Part B of this ~~M~~manual.

### **II. Appeals**

Persons who have directly and materially affected interests and who have been or will be adversely affected by any substantive or procedural action or inaction related to the development, approval, revision, reaffirmation, or ~~retirement-withdrawal~~ of a ~~Standard~~[SPP RE Regional Reliability Standard](#) shall have the right to appeal. This appeals process applies only to the [SPP RE Regional Reliability Standards ~~process-Process~~ as ~~defined-outlined~~ in \[Section V, Part B of this ~~M~~manual\]\(#\)~~procedure~~.](#)

The burden of proof to show adverse effect shall be on the appellant. Appeals shall be made within 30 days of the date of the action purported to cause the adverse effect, except appeals for inaction, which may be made at any time. In all cases, the request for appeal must be made prior to the next step in the process.

The appeal will be addressed by the [SPP RE Trustees](#). The appeal is included in a Minority Report of the [Consensus Draft ~~Standard~~\[SPP RE Regional Reliability Standard\]\(#\)](#), which remains a part of the record for the [proposed ~~Standard~~\[SPP RE Regional Reliability Standard\]\(#\)](#) throughout the [SPP RE Regional Standards ~~Development~~\[Procedure Process\]\(#\)](#).

[The ~~SPP RE Trustee's~~ \[The\]\(#\) final decisions of any appeal shall be documented in writing and made public.](#)

A complaint will be noted in a Minority Report, including the substantive or procedural action or inaction associated with a [proposed ~~SPP RE Regional ~~r~~Reliability ~~s~~Standard~~ or the \[SPP RE Regional ~~s~~Standards ~~Development~~ ~~p~~Process\]\(#\). The complaint should describe the actual or potential adverse impact to the appellant. The \[SPP RE Trustees\]\(#\) will provide a written response to the complaint. The appellant's response to the \[SPP RE Trustees\]\(#\) determination will be included in the Minority Report.](#)

The [SPP RE Trustees](#) shall provide a response to any remaining open complaints.

## Appendix B: SPP RE Regional Standard Request Form

RSR Number _____	_____	RSR Title _____	_____
SPP <u>RE</u> Regional <u>Reliability</u> Standard Name (include Section No., Title, and existing Standard Version if any) _____			
Requested Resolution Date (if applicable) _____			
Description _____			
Reliability Need or Purpose – Try to identify if known: Technical requirements, reliability risk factor, measurements (refer to SPP <u>RE</u> <u>Regional Reliability</u> Standards <u>Development</u> Process Manual for descriptions). _____			
Tariff Implications or Changes (Yes or No; If yes include a summary of impact and/or specific changes) _____			
Criteria Implications or Changes (Yes or No; If yes include a summary of impact and/or specific changes) _____			
NERC Standard Implications (Yes or No, and summary of impact) _____			

Sponsor	
_____	
Name _____	_____

<b>E-mail Address</b>	
<b>Company</b>	
<b>Company Address</b>	
<b>Phone Number</b>	
<b>Fax Number</b>	

<b>Proposed Regional Standard Language</b>
--------------------------------------------

## Appendix C: SPP RE Regional Standard Request Comment Form

<b>RSR Number</b> _____	_____	<b>RSR Title</b> _____	_____
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<b>Date</b> _____	_____
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Submitter's Information	
<b>Name</b> _____	_____
<b>E-mail Address</b> _____	_____
<b>Company</b> _____	_____
<b>Company Address</b> _____	_____
<b>Phone Number</b> _____	_____
<b>Fax Number</b> _____	_____

**Comment Form Instructions (please delete before submitting comments):**

Comments are to be submitted electronically and are due by close of business of the comment due date. Please follow this file naming convention:  
**###PRR <Company Name> Comments<date>.doc.**

<b>Comments</b>
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<b>Revised Regional Standard Language</b>
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# Appendix D: SPP RE Regional Reliability Standards Development Procedure

