

*via e-mail to* ROPcomments@nerc.net

**COMMENTS OF TRANSMISSION ACCESS POLICY STUDY GROUP  
ON POSTING OF PROPOSED CHANGES TO NERC RULES OF PROCEDURE  
DATED MAY 14, 2021**

TAPS appreciates the opportunity to comment on NERC’s proposed changes to Section 300 and Appendices 3B and 3D of the NERC Rules of Procedure (“ROP”), dated May 14, 2021.<sup>1</sup> TAPS strongly urges NERC to further revise Appendix 3D to remove Segment 10 from the Registered Ballot Body.

TAPS supported NERC’s proposal, in its November 2, 2020 posting of proposed CMEP-related changes, to eliminate ROP language regarding Regional Entity compliance with Reliability Standards, since no Reliability Standards are now applicable to Regional Entities. And—appropriately, given that the Regional Entities are no longer hybrid stakeholder/enforcers—NERC’s recent changes to its Bylaws removed the Regional Entity voting seats on the Member Representatives Committee. NERC should complete this transition of Regional Entity roles by removing Segment 10 from the Registered Ballot Body in Appendix 3D. The ERO has an important role in standards development; for example, TAPS believes that the input of Compliance Staff would be very valuable to drafting teams. But, as similarly noted by EEI in its comments submitted on this ROP posting, it is inappropriate for the Regional Entities to vote on standards.

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<sup>1</sup> NERC Rules of Procedure, Section 300 (proposed May 14, 2021), [https://www.nerc.com/AboutNERC/RulesOfProcedure/ROP%20SECTION%20300\\_redline%20to%20currently%20effective.pdf](https://www.nerc.com/AboutNERC/RulesOfProcedure/ROP%20SECTION%20300_redline%20to%20currently%20effective.pdf) (“Proposed Rules”); NERC Rules of Procedure, Procedure for Election of Members of the Standards Committee, Appendix 3B (proposed May 14, 2021), [https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix\\_3B\\_Election\\_StandardsCommittee\\_Procedures\\_redline%20to%20last%20approved.pdf](https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix_3B_Election_StandardsCommittee_Procedures_redline%20to%20last%20approved.pdf) (“Proposed Appendix 3B”); and NERC Rules of Procedure, Development of the Registered Ballot Body, Appendix 3D (proposed May 14, 2021), [https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix\\_3D\\_BallotBodyCriteria\\_redline%20to%20last%20approved.pdf](https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix_3D_BallotBodyCriteria_redline%20to%20last%20approved.pdf) (“Proposed Appendix 3D”).