

MSPPTF Potential Improvement Opportunities Industry Feedback Questionnaire

Responses Due by August 27, 2025

The Modernization of Standards Processes and Procedures Task Force (MSPPTF) invites stakeholders to provide feedback on a white paper on potential improvement opportunities for transforming how NERC develops its Reliability Standards in three areas: standards initiation, standards development, and balloting.

The MSPPTF was formed by a February 2025 NERC Board of Trustees resolution to conduct a strategic review of and re-envision the standards process. The goal of this initiative is to enable the timely resolution of reliability issues that merit a standard while maintaining the traditional hallmarks of stakeholder engagement for which NERC is known.

The MSPPTF has been working diligently since its inception under the following guiding principles:

- Transform and Modernize the Process: Re-envision a modernized standard development process to address evolving risks.
- Create Efficiencies: Identify areas of opportunity and recommendations to save time and remove redundant steps in the current process.
- Develop a Trusted Process: Provide clear opportunities for stakeholder input, due process, openness, and balance of interests.

Resources regarding the MSPPTF (including the white paper) can be found on the [MSPPTF's web page](#).

Standard Initiation Questions

- 3) **Free-Response:** **What opportunities, or aspects of the opportunities, do you support the Task Force pursuing and why? Do you have any suggestions to enhance them?** *Please refer to the Standards Initiation potential improvement opportunities in the white paper (pages 13-19). The white paper can be found here: <https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.*

TAPS is generally supportive of Potential Improvement Opportunity 1 (Implement a Biannual Review and Prioritization Process), though it believes some clarifications and modifications are needed to take full advantage of the improvement opportunities envisioned.

i. Industry Must Have a Voice in Selection of Members to a Centralized Committee

TAPS does not see a need for—and does not support—“NERC [identifying] a standing group of stakeholder experts to drive all aspects of the standards initiation process[.]” White Paper at 13. While centralizing the standards initiation process could improve the transparency, efficiency, and consistency of the process, it also concentrates power in the hands of the single committee overseeing this critical process. For the process to work as envisioned, the committee must have industry’s trust. That will require ensuring both that (1) the committee has the requisite technical and procedural expertise to effectively shepherd Standard Initiation Requests (“SIRs”) through the biannual review and prioritization process, and that (2) the committee is balanced, inclusive, and representative, reflecting the broad range of registered entities subject to compliance. TAPS strongly believes that this outcome can only be achieved—and the necessary trust secured—if all industry sectors are fairly represented on the committee and industry voices play a meaningful role in the selection of committee members.

Accordingly, TAPS suggests that, rather than creating an entirely new standing group of stakeholder experts composed of “select members from the [Reliability and Security Technical Committee (“RSTC”)], the Reliability Issues Steering Committee, other individuals, or some combination thereof,” White Paper at 13, the RSTC or a subcommittee thereof is the appropriate entity to spearhead the biannual review and prioritization process. Using the RSTC (or a subcommittee thereof) confers several advantages, including the RSTC’s existing hybrid structure, which offers opportunities for both industry and NERC to have a say in the RSTC’s membership. Industry has the opportunity to elect 22 members of the RSTC, two each from eleven identified sectors. NERC has the opportunity to review and confirm 10 at-large members (nominated by the RSTC Nominating Sub-Committee). (In addition to these members and the RSTC Chair and Vice-Chair, the RSTC also includes six non-voting members.) See RSTC Charter at 3-5. This hybrid structure ensures that the RSTC is already balanced, inclusive, and representative, addressing TAPS’s above-stated concerns about committee composition and selection.

If the Task Force declines to adopt TAPS's recommendation to use the RSTC (or a subcommittee thereof) for this function, then whatever centralized committee is developed should replicate these key features. Similarly, if a subcommittee of the RSTC is used, it must reflect the same balanced composition of the RSTC as a whole.

Additionally, using the RSTC (or a subcommittee thereof) as the centralized committee builds on pre-existing structures and resources and leverages existing technical expertise in ways that increase efficiencies. The RSTC is already responsible for all industry expert-led guidance documents, white papers, and technical papers intended to address risk reduction. And they are the only committee charged with ensuring alignment of deliverables and NERC priorities, including those established in the Reliability Issues Steering Committee (RISC) ERO Reliability Risk Priorities report. See RSTC Charter at 2. Moreover, Potential Improvement Opportunity 1 already envisions coordination among the RSTC and the envisioned centralized committee. For instance, the White Paper (at 13) contemplates the centralized committee referring proposals that may or may not merit standards development to the RSTC for further action (potential RSTC actions include the "development of guidelines, white papers, technical reference documents," and/or "additional support for a standard (to be included in a future open nomination)"). Using the RSTC as the centralized committee for the biannual SIR review and prioritization process should ensure a holistic alignment of deliverables and priorities across the board.

TAPS further suggests that the Task Force clarify how a SIR may be re-submitted in the event the RSTC determines it needs additional support. It may be most efficient for such SIRs to be automatically included in the next biannual process, unless earlier consideration is warranted, as discussed below.

ii. A Fast-Tracking Option is Needed to Avoid Potential Delays

The White Paper (at 14) proposes a separate process track for projects addressing FERC regulatory directives, urgent NERC Board initiatives, and/or directives issued under NERC's authority pursuant to section 322 of the NERC Rules of Procedure (collectively, "FERC- or NERC-directed SIRs"). TAPS is concerned that the biannual review and prioritization process, as proposed, does not include any method for processing non-FERC- or NERC-directed SIRs that miss the six-month window but may require action before the next biannual review opportunity. Accordingly, TAPS recommends developing a fast-tracking method for such SIRs to avoid an unnecessary delay of up to six months for SIRs that may be critical and/or time sensitive.

iii. There Must Be Opportunities for Industry to Provide Input on the "Term Sheet"

As described in the White Paper, for "proposals identified as meriting standard development," the centralized committee must "develop 'term sheets' to clearly describe the risks to be mitigated and the desired outcome/behavior. These 'term sheets' would then move directly to standards development." White Paper at 13.

TAPS is concerned that as currently envisioned, the “term sheet” will be too high-level given its intended use in the standards drafting process. To address that concern, the Task Force should clarify that the “term sheet” must be sufficiently specific to: (1) enable stakeholders to understand the key elements of the contemplated standard, including the entities and assets that will be subject to the standard and the scope of any exceptions; and (2) provide sufficient guidance to enable NERC staff and industry representatives to develop the initial draft standard, including through leveraging artificial intelligence (“AI”) as proposed in Standards Drafting Potential Improvement Opportunity 1 (Form a New Group or Panel to Coordinate Standards Drafting with AI Assistance). This level of detail is critical to ensure that any industry consensus on the “term sheet” is indicative of the acceptability of a draft standard reflecting those terms.

Moreover, while TAPS appreciates that the White Paper provides for industry input prior to “term sheet” development, see White Paper at 14, Figure 3.1, TAPS is very concerned by the White Paper’s failure to provide for meaningful input on the “term sheet” itself, even though that document is intended to provide the template for the standards drafting process. To address that serious deficiency, the required process should provide for one or more opportunities for comment and indicative balloting on the proposed “term sheet.” Doing so is the best means for stakeholders to provide clear feedback on whether there is a consensus that the “term sheet” provides the framework for a broadly acceptable standard.

Additionally, the process for written comments and any other formal industry engagement throughout the standard initiation process needs to be more expressly defined in any future proposal. It should be clarified that the proposed biannual conferences, if adopted, are additional to formal written comment periods, not a replacement for them.

- 4) Free-Response: What opportunities, or aspects of the opportunities, concern you? Why? Do you have any suggested modifications to address those concerns?** *Please refer to the Standards Initiation potential improvement opportunities in the white paper (pages 13-19). The white paper can be found here:*
<https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.

As discussed in response to Question 3, above, with respect to Potential Improvement Opportunity 1 (Implement a Biannual Review and Prioritization Process), TAPS has the following concerns:

- TAPS is concerned that concentrating oversight of the biannual review and prioritization process in the hands of a centralized committee whose members are all appointed by NERC would inappropriately remove industry voices from a critical component of this new process.
- TAPS is concerned that the biannual process, as envisioned, does not include a method to fast-track non-FERC- or NERC-directed SIRs that miss the biannual window but require action before the next biannual review process opens.

- TAPS is concerned that, while intended to provide for early industry engagement and consensus building, the process outlined in the White Paper for development of the “term sheet” is unlikely to yield consensus on the standard to be drafted. In particular, Potential Improvement Opportunity 1 lacks any mechanism for stakeholders to provide input on the “term sheet.”

TAPS’s suggested modifications addressing these concerns are described in detail in response to Question 3, above.

TAPS does not have significant concerns with Potential Improvement Opportunity 2 (Centralize the Process through the RSTC). However, we believe that the biannual review and prioritization process contemplated in Potential Improvement Opportunity 1 may facilitate prioritization and a more orderly process than the ongoing, monthly process contemplated in Potential Improvement Opportunity 2, with the clarifications and modifications TAPS suggests in response to Question 3.

- 5) **Free-Response: Standard Initiation: What additional suggestions or input do you have for the Task Force’s consideration?** *Please refer to the Standards Initiation potential improvement opportunities in the white paper (pages 13-19). The white paper can be found here:*

<https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.

To the extent that any of the Potential Improvement Opportunities require changes to the Standards Process Manual (Appendix 3A of the Rules of Procedure), such changes must be voted on and approved by the Registered Ballot Body, consistent with section 15 of the Manual. TAPS urges the Task Force to focus its efforts on opportunities that receive broad support from industry stakeholders.

Standard Development Questions

- 6) **Free-Response: What opportunities, or aspects of the opportunities, do you support the Task Force pursuing and why? Do you have any suggestions to enhance them?** *Please refer to the Standards Development potential improvement opportunities in the white paper (pages 20-27). The white paper can be found here:*

<https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.

TAPS recommends that the Task Force consider a hybrid of Potential Improvement Opportunities 1 (Form a New Group or Panel to Coordinate Standards Drafting with AI Assistance) and 3 (Implement Incremental Process Changes). Under our recommended

approach, a centralized committee would be responsible for producing the initial draft standard, potentially with AI assistance as appropriate (consistent with Potential Improvement Opportunity 1). However, TAPS is concerned by Potential Improvement Opportunity 1's suggestion that the use of drafting teams staffed by industry experts "become an optional path rather than a mandatory one." White Paper at 20. While we appreciate that avoiding the need for a standard drafting team may expedite the process in some circumstances, the threshold for doing so needs to be very high given the challenges with fully reflecting the range of registered entities on the standing panel. Accordingly, TAPS recommends that use of a drafting team staffed by subject matter experts to refine and finalize draft standards, with industry input through comments and, at the very least, indicative balloting (consistent with Potential Improvement Opportunity 3), remain the default process. TAPS believes this approach will deliver meaningful process improvements while preserving the robust industry engagement in the drafting process that has been foundational to the success of the ERO standards development process to date.

Step 1: Producing the Initial Draft Standard

TAPS appreciates the challenge involved in "getting off the blank page" and sees value in streamlining the process of producing an initial draft standard for review by industry. We are open to the conceptual proposal in Potential Improvement Opportunity 1 (Form a New Group or Panel to Coordinate Standards Drafting with AI Assistance) of appointing a centralized committee whose role would be to produce the first draft of approved standards. TAPS also agrees with the proposal that this committee should include both NERC Staff and industry representatives to ensure a range of perspectives and skill sets. However, certain modifications to Potential Improvement Opportunity 1 are necessary to ensure the composition and selection of this committee is balanced, inclusive, and representative, as further explained in our answer to Question 7.

The White Paper suggests (at 19) that the committee "could be the 'Stakeholder Council' described in the previous chapter, or a separate body." TAPS believes that this committee should generally be the same committee that is responsible for producing the "term sheet" as part of the standard initiation process, plus the addition of NERC Staff, which per our answer to Question 3 we recommend should be the RSTC or a subcommittee thereof. This committee will be well positioned to oversee the translation of the term sheet to an initial draft, and we do not see an advantage to forming a separate committee solely to coordinate the initial drafting process.

TAPS is also open to the idea of using AI tools to assist in producing a first draft, provided that further testing demonstrates that AI would be a useful tool in efficiently producing high quality draft standards. We caution, however, against overly optimistic reliance on potential efficiencies from AI tools prior to rigorous vetting within the specific regulatory context of reliability standards development. Any AI tools should first be tested in a controlled pilot environment and should only be adopted for wider use after NERC has adequately demonstrated through an open and transparent process that expected benefits will outweigh any expected costs.

Step 2: Finalizing the Proposed Standard

TAPS generally recommends that, after production of an initial draft, the remainder of the standard drafting process follow the process outlined in Potential Improvement Opportunity 3 (Implement Incremental Process Changes). In other words, as noted above, the use of drafting teams staffed by industry experts to complete the standard drafting process should remain the default approach and should not “become an optional path rather than a mandatory one,” as the White Paper suggests (at 20). After an initial draft is produced, it should be handed off to a drafting team unless specific and stringent criteria are met demonstrating a drafting team is not warranted, as discussed further below in response to Question 7. The drafting team would be responsible for refining and finalizing the standard aided by industry input through rounds of comments and indicative, if not full, balloting, aided by the additional tools and process enhancements identified in Potential Improvement Opportunity 3.

- 7) Free-Response: What opportunities, or aspects of the opportunities, concern you? Why? Do you have any suggested modifications to address those concerns?** *Please refer to the Standards Development potential improvement opportunities in the white paper (pages 20-27). The white paper can be found here: <https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.*

TAPS has several significant concerns with the White Paper proposals and recommends the following additional modifications to address those concerns.

- i. Any New Committee Involved in the Drafting Process Must Be Representative of, and Accountable to, Industry Stakeholders.

Potential Improvement Opportunity 1 (Form a New Group or Panel to Coordinate Standards Drafting with AI Assistance) involves forming a centralized committee to coordinate the drafting process. As explained in our answer to Question 6, TAPS is open to the concept of appointing a committee to assist in managing the standard drafting process but recommends that (1) the committee’s direct involvement in the drafting process be limited to producing an initial draft standard; (2) the committee should be the same as the committee responsible for producing the “term sheet” during the Standard Initiation Process (with the addition of NERC Staff as appropriate); and (3) that committee should be the RSTC (or a subcommittee thereof).

Under any formulation, the responsibilities and powers of the centralized committee under Potential Improvement Opportunity 1 are expansive: as proposed, they include standards drafting; soliciting and analyzing industry input, including through technical conferences; and determining whether a drafting team to further refine the draft standard is even needed. TAPS has similar concerns here as with the new committee envisioned in Standard Initiation Process Potential Improvement Opportunity 1, and similarly urges the Task Force to ensure that any new committee involved in the drafting process (1) has the requisite technical and procedural expertise to manage the drafting process, and (2) is balanced, inclusive, and representative,

reflecting the broad range of registered entities subject to compliance. As explained further in our answer to Question 3, TAPS believes the RSTC is the appropriate group to spearhead this process.

The Task Force should also consider the level and breadth of expertise required to effectively produce quality draft standards. It is essential to balance potential process efficiencies with feasibility and the time commitment involved for committee members. An overly onerous time commitment to serve on the committee will likely effectively foreclose direct participation of smaller entities, who lack the resources to devote dedicated staff for this purpose.

ii. The Important Role of Subject Matter Expert-Staffed Drafting Teams Should Be Preserved, With Appropriate Oversight.

TAPS has serious concerns that Potential Improvement Opportunities 1 (Form a New Group or Panel to Coordinate Standards Drafting with AI Assistance) and 2 (Outsource Standards Drafting) would significantly reduce, if not eliminate in many instances, the role of industry subject matter expert-staffed drafting teams in the standard drafting process. The involvement of industry subject matter experts through drafting team participation provides significant value to NERC and has been essential to the success of the ERO's standard development process to date. We strongly urge that this aspect of the existing process be retained.

TAPS acknowledges and agrees that certain unusually straightforward standards may not necessarily require drafting team input; however, we expect this will be the exception and not the norm. Thus, the default approach should continue to be that NERC (or the new committee) appoints a drafting team to refine and finalize draft standard language, consistent with the existing approach and Potential Improvement Opportunity 3 (Implement Incremental Process Changes). The committee should be barred from skipping appointment of a drafting team if: (1) a minority of the panel (e.g., any single sector) indicates a need for a drafting team; or (2) the standard is one for which there is only advisory balloting (i.e., FERC- or NERC-directed standards per Balloting Potential Improvement Opportunity 1) or for which a notice and comment process is used (per Balloting Potential Improvement Opportunity 2), to the extent the Task Force pursues either of those options. Put differently, the appointment of a drafting team should only be bypassed if: (1) sectoral representatives on the panel unanimously agree that there is no need for a drafting team; and (2) the standard is one for which there is binding balloting.

Preserving the role of standard drafting teams is especially important should the Task Force pursue some version of the process outlined in Potential Improvement Opportunity 1, given the challenges with fully reflecting the range of registered entities on the new standing committee. Given the barriers that less-resourced entities will likely face to participating in such a committee, drafting team participation may be the only way for their personnel to engage directly in the drafting process (beyond submitting comments).

In addition, while not discussed in the White Paper, a designated body is needed to oversee drafting teams. Currently, this function is performed by the PMOS liaison from the Project Management and Oversight Subcommittee of the Standards Committee. Regardless of whether/how the process is revised, this function needs to continue.

iii. The Standard Drafting Process Should Continue to Incorporate Comments and Balloting.

TAPS is concerned about Potential Improvement Opportunity 1 (Form a New Group or Panel to Coordinate Standards Drafting with AI Assistance)'s proposed elimination of balloting in the standards development process. (The White Paper is unclear whether the intent is to eliminate balloting under Potential Improvement Opportunity 3 (Implement Incremental Process Changes)). We urge the Task Force to retain the existing approach of soliciting industry feedback on draft standards through comments and balloting.

Balloting has proven to be an effective means of gathering stakeholder feedback during the drafting process and provides valuable information over and above simple comments. Balloting has also been essential to building industry buy-in prior to finalization of the proposed standard. Removing balloting from the drafting process is less likely to produce a standard supported by industry, not more so. Consequently, TAPS urges that industry feedback on draft standards should not be restricted to comments. Ballots, or at minimum indicative ballots, should be required with each comment opportunity, so that the drafting team is not denied important information needed to produce widely acceptable standards.

TAPS disagrees with the White Paper's suggestion (at 18) that industry stakeholders have been overly focused on the "specific wording of the draft standards" leading to "repeated failed ballots due to compliance-related concerns." The drafting process is the appropriate time to address compliance-related concerns with the specific wording of draft standards.

Generally, TAPS is concerned about the lack of specificity provided in the White Paper concerning proposed industry feedback mechanisms and urges the Task Force to include in future proposals more detailed explanation of when, where, and how industry feedback would be incorporated during the drafting process. For example, the White Paper (at 20, Figure 4.1) includes a step in Potential Improvement Opportunity 1 titled "Group/panel solicits stakeholder feedback on draft Standard (e.g. technical conference, posting)." This suggests that the form and nature of stakeholder engagement would be at the discretion of the committee, or at the very least is still to be determined. TAPS opposes a discretionary approach and urges the Task Force to include in any future proposals mandatory stakeholder engagement mechanisms.

iv. Outsourcing the Standard Drafting Process as Proposed in Potential Improvement Opportunity 2 is Unacceptable.

TAPS strongly opposes outsourcing the standards drafting process as described in Potential Improvement Opportunity 2 (Outsource Standards Drafting). TAPS shares the concerns identified in the White Paper (at 22) that such an approach would largely eliminate the

stakeholder role in standards drafting, which as discussed above provides significant value to NERC and the industry as a whole. Such an approach is likely to result in worse-quality standards and will increase conflict and delays during the balloting and FERC approval processes.

- 8) **Free-Response: What additional suggestions or input do you have for the Task Force’s consideration?** *Please refer to the Standards Development potential improvement opportunities in the white paper (pages 20-27). The white paper can be found here: <https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.*

To the extent that any of the Potential Improvement Opportunities require changes to the Standards Process Manual (Appendix 3A of the Rules of Procedure), such changes must be voted on and approved by the Registered Ballot Body, consistent with section 15 of the Manual. TAPS urges the Task Force to focus its efforts on opportunities that receive broad support from industry stakeholders.

Balloting Questions

- 9) **Free-Response: What opportunities, or aspects of the opportunities, do you support the Task Force pursuing and why? Do you have any suggestions to enhance them?** *Please refer to the Balloting potential improvement opportunities in the white paper (pages 28-36). The white paper can be found here: <https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.*

TAPS strongly supports Potential Improvement Opportunity 3 (Implement Incremental Changes to Registered Ballot Body Framework). Potential Improvement Opportunity 3 is the only proposal that appropriately recognizes the foundational role of the balloting process in ensuring that standards are effective and reasonable for application to the wide range of registered entities to which they apply. And balloting provides crucial information that can be used to gauge the importance of associated comments, without which it will be difficult if not impossible to effectively gauge industry support for a given standard. (That being the case, TAPS strongly disagrees with the observation made during the July 21, 2025 webinar on balloting reforms that there is no point in balloting if a standard will not pass. Whether a standard will pass is critical feedback to drafting teams and the ERO as a whole.)

The White Paper itself recognizes the very strong support among industry for preserving balloting more or less in its current form. Summarizing feedback received in response to survey questions on the standard development balloting process, the White Paper (at 27) identifies the following themes of industry’s responses:

- Balloting must stay and stay meaningful;

- The existing two-thirds supermajority approval threshold should be kept;
- Multiple balloting and commenting rounds are critical;
- Key structural elements, including segment-based voting, should be maintained;
- Transparency, communication, and past process revisions are working; and
- Inclusivity and practical usability are essential.

Given this strong support for maintaining balloting in close to its current form, the Task Force should not pursue fundamental changes to balloting. Instead, the Task Force should focus its efforts on incremental improvements, potentially including those proposed in the December 2024 Registered Ballot Body Analysis and Recommendations Report. However, given that the December 2024 Report was only just posted publicly and that the Task Force did not discuss its recommendations in detail, White Paper at 31, TAPS recommends that the Task Force further consider the recommendations in the December 2024 Report and provide a later date for submission of comments on any recommendations it proposes to pursue.

As discussed in greater detail in response to Question 10, below, TAPS strongly opposes Potential Improvement Opportunities 1 (Create a Standing Ballot Body) and 2 (Implement a Notice and Comment Process for Proposed Standards).

10) Free-Response: What opportunities, or aspects of the opportunities, concern you? Why? Do you have any suggested modifications to address those concerns? *Please refer to the Balloting potential improvement opportunities in the white paper (pages 28-36). The white paper can be found here:*
<https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.

i. Potential Improvement Opportunity 1 (Create a Standing Ballot Body)

As noted in response to Question 9, TAPS has significant concerns with respect to Potential Improvement Opportunity 1 (Create a Standing Ballot Body) and strongly opposes its adoption by the Task Force. TAPS's concerns are as follows:

- Creating a “standing ballot body consisting of representatives from various stakeholder sectors that would vote on proposed standards on behalf of their sector,” White Paper at 27, similar to the Member Representatives Committee, would preclude individual registered entities from directly identifying and expressing their concerns about a particular standard during the balloting process. Additionally, it would shift to these representatives the heavy burden of gathering and weighing the information they choose to solicit from their sector constituents to determine how to vote on behalf of the sector. As a result, individual entities would have no assurances that their voices will be heard. And it is not clear from the White Paper whether NERC will assume responsibility for

conducting the oversight necessary to ensure that ad hoc feedback processes managed by sectoral representatives comport with minimum standards of transparency and fairness.

- The White Paper envisions the sector representatives having three voting options: approve the standard, reject the standard, or abstain from voting. See White Paper at 28. But it is unclear how the representatives are meant to vote in the event that the entities in their sector have different views on the acceptability of a proposed standard. While TAPS strongly opposes the standing ballot body proposal, to the extent it is further explored TAPS notes that further clarity is needed as to whether representatives are intended to cast their votes reflective of a majority opinion, whether representatives can cast weighted votes reflective of differing opinion within the sector, whether representatives are meant to abstain in the event of a sectoral split, or otherwise.
- Critically, as proposed, the standing ballot body would be denied the opportunity to cast binding ballots on the most crucial standards: those directed by FERC or NERC. As currently contemplated, FERC- and NERC-directives will receive a single advisory ballot before being forwarded to the NERC Board for approval and adoption. See White Paper at 29. But it is more important that pivotal FERC or NERC initiatives addressing pressing and impactful reliability issues are thoroughly vetted by the regulated community and reflect industry experience, not less so. Functionally eliminating balloting for these standards and allowing the ERO to consider and act on standards without the essential stakeholder check that balloting provides is not appropriate and should not be pursued.

TAPS does not believe that modifications to Potential Improvement Opportunity 1 could address these critical concerns or result in TAPS's support. However, if notwithstanding these concerns, the Task Force opts to continue developing Potential Improvement Opportunity 1, then, at the very least, after the representatives' votes and accompanying written explanations are posted publicly, see White Paper at 28, the constituent entities in each sector who dissent from their sector's vote should be given an opportunity to submit for public posting and Board of Trustees review their dissenting comments.

ii. Potential Improvement Opportunity 2 (Implement a Notice and Comment Process for Proposed Standards)

TAPS has significant concerns with respect to Potential Improvement Opportunity 2 (Implement a Notice and Comment Process for Proposed Standards) and strongly opposes its adoption by the Task Force. Potential Improvement Opportunity 2 eliminates balloting and permits the ERO to consider and act on standards without the essential stakeholder check that balloting provides. This proposal is contrary to industry's strong support for maintaining the balloting process and should not be further explored. A notice and comment process is particularly inappropriate for NERC, which is not subject to the same legal decision-making standards as FERC and so lacks the accountability mechanisms essential to a fair and transparent notice and comment process. Moreover, introducing notice and comment processes at NERC would essentially eliminate the added value NERC provides and render it redundant of FERC.

TAPS does not believe that modifications to Potential Improvement Opportunity 2 could address this critical concern or result in TAPS's support.

11) Free-Response: What additional suggestions or input do you have for the Task Force's consideration? *Please refer to the Balloting potential improvement opportunities in the white paper (pages 28-36). The white paper can be found here: <https://www.nerc.com/gov/bot/MSPP/MSPPTF%20White%20Paper%20-%20July%202025.pdf>.*

TAPS urges the Task Force to consider deferring further consideration of changes to the balloting process until after any changes to the standard initiation and drafting processes are implemented. Given the scope and complexity of the changes under consideration, TAPS is concerned that simultaneous implementation of changes to the initiation, drafting, and balloting processes may be overambitious and could create unintended adverse consequences. Moreover, TAPS believes that certain of the proposed changes to the initiation and drafting stages, with appropriate modifications as described in our comments, may be sufficient to address the Task Force's objectives.

To the extent that any of the Potential Improvement Opportunities require changes to the Standards Process Manual (Appendix 3A of the Rules of Procedure), such changes must be voted on and approved by the Registered Ballot Body, consistent with section 15 of the Manual. TAPS urges the Task Force to focus its efforts on opportunities that receive broad support from industry stakeholders.

Thank you for taking the time to provide your feedback. The MSPPTF will consider your feedback as it develops draft recommendations.

Resources regarding the MSPPTF (including the white paper) can be found on the [MSPPTF's web page](#).