

MSPPTF Draft Recommendations Stakeholder Feedback Questionnaire

Responses Due by November 10, 2025, at Noon Eastern Time

This Word version of the questionnaire is being provided for convenience. Please submit all responses through the [online feedback form](#).

The MSPPTF invites stakeholders to provide feedback on the draft recommendations for transforming how NERC develops its Reliability Standards in three areas: standard initiation, standard drafting, 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 draft recommendations) can be found on the [MSPPTF's web page](#).

Standard Initiation Questions

- 4) **Multiple Choice: Standard Initiation (p. 10 - 20) How comfortable are you with the recommended composition of the new RISC Subcommittee?** *MSPP Task Force Recommendation: Appointed members from the RISC and RSTC and other selected individuals with technical expertise*
- a) Very Comfortable
 - b) Somewhat Comfortable
 - c) Neutral/No Opinion
 - d) Somewhat Uncomfortable
 - e) **Very Uncomfortable**
- 5) **Free Response: Please elaborate on your response to the previous question.**

TAPS appreciates the efforts of the MSPP Task Force (“Task Force”) to front-end the standard development process and create structures that build efficiencies and early consensus to produce high-quality standards that are fairly applicable to the wide range of registered entities that will be subject to compliance with or otherwise affected by them. The Task Force proposes to assign a key role in this process to a new Reliability Issues Steering Committee (“RISC”) Subcommittee, which it characterizes as “positioned to drive the standard development process, and the standard initiation phase specifically.” Draft Recommendations at 14. As envisioned, the RISC Subcommittee would be responsible for:

- (1) initiating a process to obtain stakeholder feedback on the Reliability and Security Technical Committee’s (“RSTC”) assessment of and recommendations for each Standard Initiation Request (“SIR”) submitted during one of the twice-yearly open periods for submission of SIRs;
- (2) issuing a Standard Initiation Review and Prioritization Document that sets forth the Subcommittee’s determination as to which SIRs are approved for standard development activities and the prioritization of those standard development activities;
- (3) developing a “Reliability Standard Term Sheet” for each SIR approved to move forward into standard drafting;
- (4) forming a panel of subject matter experts (“SMEs”) who may be called upon to assist with reviewing and refining draft standards and supporting material; and
- (5) generally maintaining oversight over the standard drafting and balloting processes.

Draft Recommendations at 16-18; 23-24; 33.

A balanced, inclusive, and representative committee that reflects the broad range of registered entities subject to compliance is critical to securing industry trust and ensuring the early consensus-building necessary to a modern and efficient standard development process.

But TAPS has serious concerns that the RISC Subcommittee, as proposed, will not provide these essential ingredients.

As contemplated in the Draft Recommendations, the RISC Subcommittee will be “comprised of RISC members, RSTC members, and other individuals with appropriate expertise.” Draft Recommendations at 14; see also July 2025 MSPP White Paper at 13 (discussing the composition of the then-proposed Stakeholder Council). The Task Force envisions that “(1) the RISC would appoint members from the RISC to the subcommittee, (2) the RSTC would appoint RSTC members to serve on the RISC subcommittee, and (3) the RISC would use an open nomination period at a set time each year for selecting members that are not drawn from the RISC or the RSTC.” Draft Recommendations at 14-15. While it is not entirely clear from the language of the Draft Recommendations, TAPS understands, based on the framing of Question 6, that the open nomination process would result in these non-RISC, non-RSTC members being appointed (rather than elected) to the RISC Subcommittee.

TAPS strongly believes that if the RISC Subcommittee is to work as intended and fulfill the consensus-building purpose of these reforms, all industry sectors must be fairly represented on the committee, with industry playing a meaningful role in the selection of committee members. Requiring election of at least one member by each sector will provide the needed balance, inclusiveness, and diversity, with accountability, in ways that a committee composed entirely of appointed representatives will not.

In its comments on the Task Force’s July 2025 MSPP White Paper, TAPS highlighted the hybrid structure of the RSTC, which offers opportunities for both industry and NERC to have a say in the RSTC’s membership. Specifically, 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.

TAPS continues to urge the Task Force to replicate these key features in the structure and composition of the RISC Subcommittee. Specifically, TAPS urges that industry have the opportunity to elect at least one member from each sector, with the RISC and RSTC given the opportunity to appoint 10-15 at-large members (who may or may not be RISC or RSTC members themselves) that are selected to ensure that the RISC Subcommittee has access to the full range of expertise needed. The resulting RISC Subcommittee would then be well positioned to effectively perform its central role in the re-envisioned standard development process.

6) **Multiple Choice: Standard Initiation (p. 10 – 20) How comfortable are you with RISC Subcommittee members being appointed, as currently recommended?**

- a) Very Comfortable
- b) Somewhat Comfortable
- c) Neutral/No Opinion
- d) Somewhat Uncomfortable
- e) **Very Uncomfortable**

7) **Free Response: Please elaborate on your response to the previous question.**

As discussed in TAPS's responses to Questions 4 and 5, TAPS is not comfortable with the RISC Subcommittee being entirely appointed.

TAPS would, however, be comfortable with a sizeable subset of the RISC Subcommittee being appointed by the RISC and RSTC (10-15 at-large members), as long as industry is given the opportunity to elect a comparable subset (at least one member from each sector), as discussed in greater detail in TAPS's response to Question 5.

8) **Multiple Choice: Standard Initiation (p. 10 – 20) How comfortable are you with the timing of the “handoff” from the RSTC to the RISC subcommittee, as currently recommended? RSTC does initial technical review of Standard Initiation Requests then hands off to the RISC subcommittee to manage the Standard Initiation Workshop, make the ultimate determination on which requests should proceed to standard development and prioritization, and draft Reliability Standard Term Sheets.**

- a) **Very Comfortable**
- b) Somewhat Comfortable
- c) Neutral/No Opinion
- d) Somewhat Uncomfortable
- e) Very Uncomfortable

9) **Free Response: Please elaborate on your response to the previous question.**

TAPS is supportive of the Draft Recommendation to have the RSTC review “the technical justification of all complete [SIRs] submitted during the submission period” and “prioritize the [SIRs] it recommends moving to standard development.” Draft Recommendations at 12. TAPS agrees that use of the RSTC in this manner appropriately builds on pre-existing structures and resources and leverages existing technical expertise in ways that increase efficiencies.

TAPS particularly appreciates the Task Force's recognition that should a SIR “focus on an implementation or compliance issue not within the technical expertise of the RSTC . . . the RSTC could recommend that some other group review the need for a

standards development project to address the issue raised in such a [SIR].” Draft Recommendations at 16.

TAPS recommends that the Task Force make clear that for implementation- or compliance-focused SIRs, the expectation is that the RSTC would solicit the input of the Compliance and Certification Committee.

TAPS notes that, as proposed in the Draft Recommendations, the objective of the RSTC’s technical review is to assess “whether the reliability risks underlying the [SIRs] warrant standard development activity” or “whether some other action is more appropriate (e.g., a reliability guideline, technical reference document, NERC Alert).” Draft Recommendations at 16. TAPS recommends that the Task Force clarify that, where the RSTC finds that a SIR does not have a sufficient basis to move forward to standard development activity based on the technical support provided in that SIR, that the RSTC may add the issue addressed by the SIR to the RSTC work plan for further technical evaluation, after which the RSTC may subsequently: (1) recommend approval of the SIR as proposed or (2) modify and re-submit the SIR on its own initiative. Having this option is important to ensure the ERO Enterprise can get in front of emerging issues.

10) Multiple Choice: Standard Initiation (p. 10 – 20) How much do you support the proposed RISC subcommittee governance structure as a subcommittee of the RISC, as currently recommended, rather than as a new stand-alone committee reporting to the Board?

- a) Strongly Support
- b) Somewhat Support
- c) Neutral/No Opinion**
- d) Somewhat Oppose
- e) Strongly Oppose

11) Free Response: Please elaborate on your response to the previous question.

Consistent with its comments on the July 2025 MSPP White Paper, TAPS continues to believe that the RSTC or a subcommittee thereof is a more appropriate entity to spearhead the twice-yearly review and prioritization process. But to the extent the structure and composition of the proposed RISC Subcommittee is modified as TAPS recommends, TAPS takes no position on whether the RISC Subcommittee reports to the RISC or to the NERC Board of Trustees.

12) Multiple Choice: Standard Initiation (p. 10 – 20) Overall, how do you find the proposed changes to Standard Initiation?

- a) Completely Acceptable
- b) Somewhat Acceptable
- c) Neutral/No Opinion
- d) Somewhat Unacceptable

e) Completely Unacceptable

13) Free Response: Please elaborate on your response to the previous question.

While TAPS is generally supportive of the overarching concept of the proposed changes to the standard initiation process (i.e., the transition to a twice-yearly review and prioritization process), TAPS has serious concerns with fundamental aspects of the proposed process, including (1) the selection and composition of the RISC Subcommittee; and (2) the lack of mandatory stakeholder comments and straw polling on the proposed "Reliability Standard Term Sheets" ("Term Sheets"). If these concerns go unaddressed, the Draft Recommendations are not acceptable. TAPS also recommends the Task Force clarify the level of detail to be included in Term Sheets and allow for stakeholder comment on a Term Sheet template. These issues, and TAPS's recommendations to address them, are discussed in more detail below.

FIRST, as previously discussed in TAPS's answers to Questions 4 and 5, TAPS has serious concerns with the selection and composition of the RISC Subcommittee. But TAPS could support the RISC Subcommittee if it were modified to include key features of the existing hybrid structure of the RSTC. Specifically, TAPS would be supportive of a structure wherein industry could elect to the RISC Subcommittee at least one member of each industry sector, with the RISC and RSTC appointing 10-15 at-large members. For greater detail on TAPS's recommendation, please see TAPS's response to Question 5.

SECOND, TAPS is deeply concerned that the proposed process for developing Term Sheets lacks any mandatory opportunities for stakeholder feedback on the Term Sheet. TAPS urges the Task Force to require that the RISC Subcommittee solicit stakeholder comments and issue a straw poll for each draft Term Sheet.

TAPS is supportive of the overarching concept of the Term Sheet and its intended role in providing for early industry engagement and consensus building. And TAPS appreciates the need for flexibility throughout the standard initiation process. However, TAPS strongly opposes the proposal that the RISC Subcommittee "provide opportunity for stakeholder input on draft Reliability Standard Term Sheets as it deems appropriate." Draft Recommendations at 17. As currently contemplated, the "RISC subcommittee MAY post the draft Reliability Standard Term Sheet for written comments from all interested stakeholders or hold a technical conference to solicit feedback, AS IT DEEMS NECESSARY. The RISC subcommittee MAY also conduct a straw poll to gauge industry consensus." Draft Recommendations at 17 (emphasis added).

It is entirely unacceptable that stakeholder input on any given Term Sheet be left to the sole discretion of the RISC Subcommittee. Solicitation of stakeholder feedback on the Term Sheet is crucial to the core purpose of assessing and building consensus early on the terms of the standards that will be drafted and balloted. The RISC Subcommittee

should have no discretion to bypass meaningful stakeholder feedback on this essential step in the process.

Rather, all Term Sheets should be subject to mandatory posting for written comments and accompanied by a straw poll. However, and as discussed in greater detail in TAPS's response to Question 17, the straw poll as currently envisioned fails to ensure consistency with—and in fact deviates from—the proposed structure for balloting. To function as a useful indicator of industry consensus regarding the key terms of a standard that will be successfully balloted, TAPS urges that (1) the votes in the straw poll must be tallied and weighted by sector, just like in balloting; and (2) the response options must be identical to those used in balloting (i.e., affirmative with comments; affirmative without comments, and negative with comments). Discretion should be left to the RISC Subcommittee, having received this feedback, to decide whether further feedback is necessary in the form of a technical workshop or other means.

FINALLY, TAPS is concerned that that the Term Sheet will be too high-level given its intended use in the standard drafting process. As described, the "Reliability Standard Term Sheet would describe the risk that the standard development project would address and outline the basic elements of the standard to be developed to address that risk. Like a term sheet associated with a business arrangement that outlines the basic terms and conditions of the agreement at a high level subject to further negotiation, the Reliability Standard Term Sheet would provide a high-level description of the standard—proposed standard family, purpose, applicability, and description of requirements—to facilitate the drafting of the standard." Draft Recommendations at 17.

To be meaningful, 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 to prepare a "version zero" draft standard based on the contents of the Term Sheet.

TAPS acknowledges and supports the Task Force's proposal (Draft Recommendations at 19) that a Term Sheet template be developed. However, details about this proposal are extremely limited: all that is said is that the "[the Task Force] proposes that NERC staff develop a template for a Reliability Standard Term Sheet." Draft Recommendations at 19. TAPS urges the Task Force to expressly provide opportunities for stakeholder review of and comment on this suggested Term Sheet template. Such stakeholder input is needed to set up a structure for producing Term Sheets that include the specificity described by TAPS in the paragraph above.

Standard Drafting Questions

14) Multiple Choice: Standard Drafting (p. 21 - 28) The Stakeholder SME Panel as a replacement for standard drafting teams will adequately preserve industry's role in standard drafting while reducing burden on industry.

- a) Strongly Agree
- b) Agree
- c) Neutral/No Opinion
- d) Disagree
- e) Strongly Disagree

15) Free Response: Please elaborate on your response to the previous question.

TAPS strongly disagrees with the statement that “the Stakeholder SME Panel will adequately preserve industry’s role in standard drafting while reducing burden on industry.” Although TAPS appreciates NERC’s desire to streamline the process of staffing teams for standard drafting and to ease participation burdens for industry, see Draft Recommendations at 22, TAPS does not agree that the proposed Stakeholder SME Panel structure will accomplish these goals. On the contrary, it effectively excludes smaller entities and their representatives from direct participation in the standard drafting process. This would undermine (rather than preserve) the role of a significant portion of industry, including the registered entities that will be required to comply with or otherwise be affected by the standard.

Notwithstanding these strong reservations, the Stakeholder SME Panel could be acceptable to TAPS with two important modifications to facilitate broader participation in and transparency of project teams, as described further below.

The Task Force proposes that after NERC staff produces a “version zero” draft standard, it will be assigned to a small project team. The project team is responsible for shepherding the proposed standard through the remainder of the drafting process with the assistance of NERC staff. The tasks the project team is responsible for include, but are potentially not limited to, (1) conducting informal outreach to stakeholders on an initial draft standard (as needed); (2) finalizing the initial draft standard and preparing all supporting documentation (such as Violation Risk Factors, Violation Severity Levels, and any comments); (3) reviewing and analyzing stakeholder comments on standard drafts; (4) engaging with stakeholders on approaches that may address their comments; (5) preparing written responses to stakeholder comments; (6) revising the standard as needed in response to stakeholder feedback; and (7) preparing a final report prior to balloting. Draft Recommendations at 26-27 (summarizing steps in drafting process).

Project teams are proposed to be staffed from a “Stakeholder SME Panel” composed of subject matter experts selected by the RISC Subcommittee. Draft Recommendations at

23-24. TAPS understands that, per comments made by Task Force members on the October 20, 2025 webinar, Stakeholder SME Panel members would be required to commit to a set term of 2 or more years and during that time could be assigned to any number of project teams. As proposed, stakeholder representatives that are not on the Stakeholder SME Panel have no opportunity to self-nominate to a particular project team. Nor is there any mention in the Draft Recommendations of whether observers outside the project team generally will be permitted to attend project team meetings. Rather, it is entirely left to the RISC Subcommittee to determine whether to add additional participants to project teams (including potentially as an active observer), and who is added. Draft Recommendations at 24.

TAPS strongly disagrees that the changes described above will “reduc[e] burdens on industry.” Notably, project teams appear to be responsible for much of the same work currently done by drafting teams, and individuals serving on the Stakeholder SME Panel may be assigned to multiple project teams during their tenure. Thus, the proposal increases the potential burden on individuals participating in the Stakeholder SME Panel as compared to serving on a single standard drafting team (or a single project team).

Given these significantly increased burdens for SMEs participating in the Stakeholder SME Panel as compared to the existing process, TAPS also strongly disagrees that the Stakeholder SME Panel “adequately preserve[s] industry’s role in standard drafting.” Elimination of drafting teams solicited for each standard in favor of a standing Stakeholder SME Panel will effectively exclude a portion of industry from the standard drafting process—namely, small entities and their representatives. Many TAPS members are small utilities with limited resources for whom participation in standard drafting teams is already a stretch. Given the significant and apparently unbounded time commitment required for participation in the Stakeholder SME Panel, small entities are considerably less likely to participate under the proposed approach.

As a consequence, small entities will be effectively denied the opportunity to directly participate in standard drafting, even if they have expertise relevant to a particular project or provide an otherwise underrepresented perspective on how the standard should be drafted to be effective and fairly applicable to the full range of registered entities. As such, the proposal creates “undue financial barriers to participation” and would “unreasonably restrict[]” participation in contravention of the core principle of openness that is foundational to NERC’s standard development process. NERC Rules of Procedure section 304(1); see also NERC Standard Processes Manual section 1.4.

TAPS acknowledges the Task Force’s view that other changes to the drafting process may ease participation burdens (such as greater support by NERC staff and use of artificial intelligence (“AI”) tools). See, e.g., Draft Recommendations at 25. However, these potential efficiencies are not guaranteed—nor are they inherently tied to the Stakeholder SME Panel construct. More to the point, there is a baseline level of work

involved in standard drafting that is unavoidable. Asking participants to commit to the Stakeholder SME Panel and thereby be available to join an unknown number of project teams over a multi-year span is not reasonable, nor is it feasible for small entities.

Notwithstanding these serious concerns, TAPS can support the use of the Stakeholder SME Panel provided that both of the following changes are made:

FIRST, the drafting process should allow for self-nominations to a project team for a particular standard by individuals not serving on the Stakeholder SME Panel. To facilitate this, the RISC Subcommittee should be required to publicly post the opportunity to join the project team for each SIR that proceeds to development of a draft standard and to consider self-nominations by individuals interesting in joining the project team. This change will enable representatives of smaller entities with expertise or distinct perspectives who would otherwise be unable to commit to a standing Stakeholder SME Panel to participate directly in the drafting of standards that may significantly impact them.

Importantly, accepting self-nominations in this manner need not delay the standard development process. For example, the RISC Subcommittee could post an open call for project team self-nominations along with the posting for the initial draft Term Sheet and accept self-nomination submissions concurrently with stakeholder comments on the draft Term Sheet. The nominees could then be considered alongside Stakeholder SME Panel members when staffing the project team. (There are likely other ways of timing this process that would similarly work without adding material delay.)

TAPS further recommends that, when considering any self-nominations, the RISC Subcommittee should prioritize staffing project teams in a manner that reflects the diversity of sectors and industry participants. If a project team is not sufficiently diverse and representative, it may delay identification and consideration of concerns with the proposal and impede the team's ability to develop high quality standards that can fairly be enforced over the full range of registered entities. To avoid this potential adverse outcome, there should be a presumption that a self-nominated individual will be permitted to join a project team if they represent a sector that is not adequately represented on the team.

SECOND, TAPS urges inclusion of a requirement that all project team meetings be open to public observance, and active participation by individual observers who are not staffed on the small project team should be welcomed. NERC's Drafting Team Reference Manual (at 5-6) provides that drafting team meetings "shall be open to all interested parties" and generally allows for attendance by industry observers, except in specified circumstances. However, the Draft Recommendations are unclear as to whether project team meetings will be open to the public and appear to suggest that whether to allow observers for a particular project team is left to the discretion of the RISC Subcommittee. Draft Recommendations at 24 (stating that "the RISC subcommittee could seek out . . .

additional expertise through any means it determines appropriate, including through . . . appointment of an active observer to a project team”). To the extent the MSPP Task Force is considering changing the current practice of requiring open meetings and allowing industry observers to participate in drafting teams, TAPS opposes that approach. Excluding observers would deprive the project team of helpful input in the effort to develop effective and broadly acceptable standards. It would also be contrary to the baseline requirement that NERC’s standard development process “shall be transparent to the public.” See NERC Rules of Procedure section 304(2) and NERC Standard Processes Manual section 1.4; see also Draft Recommendations at 40 (noting that “NERC recognizes that stakeholder participation, through an open and transparent process, is key to the success of the ERO model”). If the Task Force did not mean to alter the current practice around observers, TAPS requests that it clarify this aspect of the proposal.

In sum, while TAPS is concerned that the Stakeholder SME Panel selected by the RISC Subcommittee will not be broadly representative of the range of registered entities affected by a particular standard, the proposed approach could be acceptable if (and only if) TAPS’s suggestions for opening up participation in particular project teams and observing project team meetings are adopted.

16) Multiple Choice: Standard Drafting (p. 21 - 28) The recommendation for reimagining the public comment period and using straw polls to assess consensus on draft standard provides stakeholders the opportunity to provide feedback and input on developing standards.

- a) Strongly Agree
- b) Agree
- c) Neutral/No Opinion
- d) Disagree**
- e) Strongly Disagree

17) Free Response: Please elaborate on your response to the previous question.

TAPS applauds the Task Force’s proposal to (i) use mandatory comment periods to collect qualitative stakeholder feedback in the standard drafting phase and (ii) include a straw poll with each comment opportunity. Draft Recommendations at 26. These additions are a marked improvement over the July 2025 MSPP White Paper, which left the method and frequency of stakeholder feedback on draft standards to the discretion of the overseeing committee. That said, TAPS objects to two aspects of the proposed framework: (1) the proposed straw polls are not structured to be truly indicative of balloting; and (2) the “fast track” comment timelines are unreasonably short.

FIRST, TAPS is concerned that, as currently proposed, the straw poll will not operate as an effective gauge of industry consensus that can be relied upon by the project team and NERC during the drafting and revision process. In particular, the specific straw poll

questions proposed by the Task Force undermine the straw poll's effectiveness as a tool to measure industry consensus. The Task Force proposes that the straw poll voting options be "Support," "Support with Changes," or "Not Support." Draft Recommendations at 26. These options deviate from the options proposed for balloting. Draft Recommendations at 33 (proposing to include balloting options for "Affirmative," "Affirmative with Statement," and "Negative with Statement"). Because of this mismatch, the straw poll results are unlikely to provide an accurate indicator of how entities will ultimately vote in balloting. Further, the proposed straw poll options are ambiguous. In particular, the phrase "Support with Changes" is inherently vague and its inclusion as a response option substantially reduces the usefulness of the straw poll to assess consensus. (For instance, whereas "Affirmative with Statement" makes clear that the voter ultimately supports the draft standard, the distinction between "Support with Changes" and "Not Support" may be nothing more than a matter of framing).

In addition, the Draft Recommendations provide no guidance on how voting in the straw poll will be tabulated, including whether the weighted voting structure used in balloting will apply to straw polls. Consequently, the Draft Recommendations could allow for straw polls to be administered in a way that is inconsistent with the balloting framework, diminishing their usefulness as a tool for gauging industry consensus.

To be effective in assessing the degree of consensus, TAPS urges that straw polls should be structured to be consistent with balloting. That is, straw poll votes should be counted and tallied by sector, and the questions to be answered should be identical to those used in balloting (i.e., "Affirmative," "Affirmative with Statement," and "Negative with Statement"). This recommendation also applies to straw polling on Term Sheets, consistent with TAPS's answer to Question 13.

SECOND, TAPS is concerned that the proposed comment timelines for fast-tracked standards are insufficient to permit meaningful stakeholder engagement. The Task Force proposes that draft standards not on a fast track will be posted for a 45-day initial comment period; if needed, any revised draft standard will be posted for 30 days. For fast-tracked projects implementing urgent FERC and NERC directives, however, the initial comment period may be as few as 25-30 days, and subsequent drafts may be posted for as few as 15-20 days. Draft Recommendations at 26. The shortened comment periods for fast-tracked standards are simply too tight to enable robust stakeholder feedback and may make providing such feedback impossible for trade associations, such as TAPS, that need time to survey members before developing a response. Given that FERC- and NERC-directed projects often pertain to important and novel areas that raise complex issues, providing sufficient time for meaningful stakeholder review of such proposed standards is essential.

The abbreviated comment period timelines for fast-tracked standards are particularly concerning given that, as proposed, there may be little to no upfront process to build industry consensus on such projects. As proposed, FERC- and NERC-directed projects

would skip both technical review by the RSTC and the Standard Initiation Workshop, and there is no assured opportunity for written stakeholder comment and straw polling on the Term Sheet. See TAPS's response to Question 31.

TAPS urges that a minimum comment and straw poll period of 30 days should be required for fast-tracked standards for both initial and subsequent postings. 30 days is the minimum period necessary to enable stakeholders to develop meaningful and constructive comments, which will ultimately aid the project team in expeditiously drafting high-quality and broadly acceptable standards. (A minimum of 30 days is necessary even if the Term Sheet process were made more robust, as urged in TAPS's response to Question 13.)

18) Multiple Choice: Standard Drafting (p. 21 - 28) Overall, how do you find the proposed changes to Standard Drafting?

- a) Completely Acceptable
- b) Somewhat Acceptable
- c) Neutral/No Opinion
- d) Somewhat Unacceptable**
- e) Completely Unacceptable

19) Free Response: Please elaborate on your response to the previous question.

TAPS has serious concerns with the Task Force's proposed changes to the standard drafting process, especially the proposal to replace drafting teams with project teams staffed exclusively from a standing panel of industry experts. As indicated in response to Question 15, the Stakeholder SME Panel proposal would effectively exclude smaller entities from direct participation in standard drafting, harming them and inhibiting the capacity of the standard development process to produce standards that can be fairly applied to the full range of registered entities. This is not acceptable.

However, the overall process framework proposed by the Task Force for standard drafting (including the Stakeholder SME Panel proposal) could be acceptable to TAPS if the following changes were made:

(1) The Stakeholder SME Panel proposal should be modified to permit individuals to self-nominate to serve on a project team without joining the Stakeholder SME Panel, with a presumption that representatives of underrepresented sectors will be included.

(2) All project team meetings should be open to the public and active participation by observers should be welcomed.

(3) Straw polls on draft standards should be structured to be consistent with balloting, with questions identical to those used in balloting and with straw poll votes tallied and weighted by sector.

(4) Stakeholders should be given a minimum of 30 days to comment on fast-tracked draft standards.

TAPS strongly supports the Task Force's proposals to use mandatory comment periods to collect stakeholder feedback on draft standards and to include a straw poll with each comment opportunity, as noted in the answer to Question 17.

Finally, TAPS wishes to reiterate the importance of a cautious approach to use of AI tools in the standard development process, as expressed in our comments on the July 2025 MSPP White Paper. TAPS is particularly concerned about the proposed use of AI tools to review and summarize stakeholder comments. See Draft Recommendations at 26. Because AI summaries may gloss over important nuances and technical details, overreliance on such tools by project teams and NERC could lead to a failure to consider and respond to every stakeholder written comment. TAPS also requests that the Task Force confirm that any changes in how comments may be summarized as result of the proposal will not alter the current practice of providing public access to the full text of all stakeholder comments.

Balloting Questions

20) Multiple Choice: Balloting (p. 30 – 39) The recommended rule changes, such as not forming ballot pools early in the process and allowing one voter or alternate to represent multiple segments, rather than requiring one distinct voter for each segment, would ease participation burdens on entities.

- a) Strongly Agree
- b) Agree**
- c) Neutral/No Opinion
- d) Disagree
- e) Strongly Disagree

21) Free Response: Please elaborate on your response to the previous question.

TAPS agrees that not forming ballot pools early in the process will ease the participation burden on entities. TAPS takes no position on the other recommended rule changes referenced in the question.

22) Multiple Choice: Balloting (p. 29 - 39) How much would you support a recommendation to require Registered Ballot Body members for corporate entities to attest or certify that they have sufficient authority to represent their

organization or have the approval of executive management for their balloting position?

- a) Strongly Support
- b) Somewhat Support
- c) Neutral/No Opinion
- d) Somewhat Oppose**
- e) Strongly Oppose

23) Free Response: Please elaborate on your response to the previous question.

The Task Force proposes to add a requirement that Registered Ballot Body (“RBB”) members “for corporate entities” attest or certify that they have sufficient authority to represent the company or have approval of executive management for their balloting position. Draft Recommendations at 34. While there could be value in requiring RBB members to provide a demonstration of authority to represent the company, requiring such a demonstration for each ballot would create an onerous and unnecessary barrier to voting, especially given the proposed tight deadlines for balloting.

The process of obtaining management sign-off on such an attestation or certification can be particularly time consuming for public power entities given required internal approval processes, and in some instances may be infeasible under the timeframes envisioned by the Task Force. Requiring demonstration of executive management approval of individual balloting positions would be similarly, if not more, problematic. TAPS expects that any such attestation or certification requirement would suppress participation in balloting, especially for public power.

Accordingly, TAPS urges that the Task Force instead adopt an annual certification process by which the entity can certify that their RBB members have authority to speak for the entity. This will achieve the Task Force’s goal without creating barriers to voting or unnecessary paperwork.

24) Multiple Choice: Balloting (p. 29 - 39) The proposed changes to the balloting Segments make sense and are fair.

- a) Strongly Agree
- b) Agree
- c) Neutral/No Opinion
- d) Disagree
- e) Strongly Disagree**

25) Free Response: Please elaborate on your response to the previous question.

While TAPS strongly supports retention of individual balloting, collapsing the transmission-dependent utility (“TDU”) and load-serving entity (“LSE”) segments is completely unacceptable.

TAPS understands the MSPP Task Force's aim was to develop "a more resource-efficient balloting framework" and to simplify the balloting structure. Draft Recommendations at 35, 38. But doing so by combining the TDU and LSE segments contradicts the basic purpose of having weighted segments in the first place. The purpose of having these weighted segments is to ensure that distinct perspectives are captured by the ballot body and that each group of entities with a common set of interests is fairly represented. See, e.g., NERC Rules of Procedure section 304(4) ("The process shall fairly balance interests of all stakeholders"); NERC Standard Processes Manual section 1.4 ("The Reliability Standards development processes shall have a balance of interests. Participants from diverse interest categories shall be encouraged to join the Registered Ballot Body and participate in the balloting process, with a goal of achieving balance between the interest categories."). This principle is consistent with Federal Power Act section 215(c)(2)(A)'s requirement that all ERO committees (and any subordinate organizational structure) assure fair stakeholder representation and balanced decision making, as well as with the NERC Bylaws and Rules of Procedure. NERC Bylaws Art. IX, section 2 ("The Rules of Procedure shall provide for the development of Reliability Standards through an open, transparent, and public process that provides for . . . balancing of interests."); NERC Rules of Procedure section 304(4); see also Federal Power Act section 215(c)(2)(D) (requiring NERC to "provide for . . . balance of interests in developing reliability standards and otherwise exercising its duties").

Combining Segment 3 and Segment 4 violates this principle of fairly representing distinct perspectives and should not be adopted. At a fundamental level, the desire to make balloting more efficient cannot be used to disenfranchise TDU voters, whose voices will be drowned out by those of transmission-owning LSEs if the two segments are combined as proposed.

TDUs are uniquely situated. They are entirely reliant on the reliability of transmission owned by others to serve their loads and, because of this vulnerability, are especially sensitive to the need for standards capable of protecting the reliability of the transmission systems on which they depend. At the same time, they have experience with complying with standards and views on what is needed to make such compliance workable for small entities. And TDUs are responsible for paying both their own compliance costs as well as those of the transmission owners (through transmission rates). As a result, TDUs, which are predominantly not-for-profit entities, are particularly sensitive to both the costs and reliability benefits of new standards.

For these reasons, TDUs have long been recognized by the NERC Bylaws and in the Registered Ballot Body as having a distinct perspective from transmission-owning LSEs. See NERC Bylaws Art. II section 4(a)(v). As noted above, that perspective would largely be lost if, as proposed, the independent TDU segment were collapsed into a combined TDU/LSE segment.

The RBB Task Force carefully analyzed the issue identified by the MSPP Task Force: that there is currently some overlap between Segment 3 and 4. The RBB Task Force concluded that the best way to address the overlap—without violating the principles of fair stakeholder representation and balanced decision making—was to clarify the definitions so that entities could participate in either Segment 3 or Segment 4, but not both. Registered Ballot Body Analysis & Recommendations (Dec. 2024) at 11. The idea of instead collapsing these segments was raised for the very first time in these Draft Recommendations, and the MSPP Task Force did not explain why the rationale adopted by the RBB Task Force for retaining the separate TDU and LSE segments does not continue to apply. See Draft Recommendations at 37.

TAPS strongly urges the MSPP Task Force not to depart from the fundamental purpose of weighted segments—to ensure that distinct perspectives are captured by the ballot body and that each group of entities with a common set of interests is fairly represented. Instead, the MSPP Task Force should adopt the RBB Task Force’s carefully considered recommendation to clarify the segment definition language to allow entities to participate in either the TDU or LSE segments, but not both.

If the MSPP Task Force declines to adopt the RBB Task Force’s recommendation, TAPS urges the MSPP Task Force to recommend that the Board defer action at this time and take steps to further evaluate the need for consideration of changes to the RBB segment structure after any other changes to the standard development processes are implemented.

26) Multiple Choice: Overall, how do you find the proposed changes to the Balloting process?

- a) Completely Acceptable
- b) Somewhat Acceptable
- c) Neutral/No Opinion
- d) Somewhat Unacceptable
- e) Completely Unacceptable

27) Free Response: Please elaborate on your response to the previous question.

As TAPS made clear in its response to Question 25, collapsing the TDU segment into a combined TDU/LSE segment is completely unacceptable. It violates the fundamental purpose of having weighted segments in balloting—to ensure that distinct perspectives are captured by the ballot body and that each group of entities with a common set of interests is fairly represented. Instead, the proposal would disenfranchise TDU voters, whose unique perspectives and voices will be drowned out by those of transmission-owning LSEs if the two segments are combined as proposed. Adopting the RBB Task Force’s considered recommendation to retain both the TDU and LSE segments but clarify the segment definitions to require entities to register as either TDUs or LSEs

would solve the overlap issue the MSPP Task Force identifies without departing from fundamental principles of fair stakeholder representation and balanced decision making.

If the MSPP Task Force declines to adopt the RBB Task Force's recommendation, TAPS urges the MSPP Task Force to recommend that the Board defer action at this time and take steps to further evaluate the need for consideration of changes to the RBB segment structure after any other changes to the standard development processes are implemented.

As to the Task Force's other proposed changes: TAPS supports the proposal to not form ballot pools early in the process. TAPS opposes the proposal to require corporate entities to certify management approval of each balloting position, but proposes an alternative solution that achieves the same goals. TAPS's position on these items is detailed in our responses to questions 21 and 23.

Finally, TAPS has a concern not otherwise asked about in the balloting section of this survey. The Task Force proposes a 30-day posting for Confirmation Ballots, with balloting to be conducted in the final 10 days. For fast-tracked projects, however, the posting is only 10-15 days with balloting in the final 10 days. Draft Recommendations at 32. A 10-15 day window provides insufficient time for entities to review and obtain internal sign-off on a balloting position. TAPS therefore urges that a minimum posting period of 30 days be required for the initial ballot for both fast-tracked and non-fast-tracked standards. For subsequent ballots, the RISC Subcommittee should strive to provide a 30-day posting wherever possible. When the RISC Subcommittee finds exceptional circumstances that preclude use of a 30-day period, however, it would be acceptable to reduce the time for a subsequent ballot for a fast-tracked standard to no fewer than 10-15 days.

28) Multiple Choice: The proposed standard development process as a whole provides early and sufficient opportunities for industry to participate and provide input.

- a) Strongly Agree
- b) Agree
- c) Neutral/No Opinion
- d) Disagree**
- e) Strongly Disagree

29) Free Response: Please elaborate on your response to the previous question.

TAPS strongly supports the Task Force's goal of encouraging early engagement by industry and ensuring that industry has sufficient opportunities to provide input, thereby facilitating consensus on standards that will be of high technical quality and fairly applicable to the wide range of entities that will be affected by them. Unfortunately, the proposal fails to achieve these goals for four principal reasons. Because each of these

reasons is discussed in detail elsewhere in these comments, we provide a succinct summary of the objection and TAPS's proposed solution and cross-reference the relevant question.

Problem 1: There is no assured opportunity for stakeholder comments and straw polling on draft Term Sheets.

Solution 1: Require all draft Term Sheets to be posted for comment and a straw poll, including for fast-tracked projects. See TAPS's answer to questions 13 and 31.

Problem 2: Industry stakeholders have no elected representatives on the RISC Subcommittee, undermining the ability of the Subcommittee to fulfill its goal of facilitating industry consensus.

Solution 2: Structure the RISC Subcommittee to be similar to the RSTC, with industry electing at least one member from each sector, and the RISC and RSTC appointing 10-15 at-large members. See TAPS's answer to Question 5.

Problem 3: The Stakeholder SME Panel as currently proposed will effectively exclude smaller entities from participating directly in standard drafting via project teams.

Solution 3: Allow individuals to self-nominate to join a project team, with a presumption that representatives of entities in otherwise underrepresented sectors will be added to the project team. Require that project team meetings be open to the public and allow active participation by observers not on the project team. See TAPS's answer to Question 15.

Problem 4: The proposed comment periods on draft standards associated with fast-tracked projects are too short to allow for robust and meaningful stakeholder feedback.

Solution 4: Require that all draft standards be posted for a minimum comment period of 30 days, for both initial drafts and any subsequent revisions. See TAPS's answer to Question 17.

In addition, while not directly relevant to early industry engagement, certain of the proposed balloting changes undermine the sufficiency of industry input at that stage. In particular, (1) the merger of the TDU and LSE segments would significantly degrade the ability of TDUs, as a discrete interest group with a distinct and important perspective on reliability issues, to provide meaningful input into the standard development process; and (2) the proposed timeframes for balloting on fast-tracked projects are unworkably short. See TAPS's answers to Questions 25 and 27.

30) Multiple Choice: The "Fast Track" (p. 26, 32) for regulatory directives and critical reliability risks identified by the NERC Board is appropriate in scope and process.

- a) Strongly Agree
- b) Agree
- c) Neutral/No Opinion
- d) Disagree
- e) Strongly Disagree

31) Free Response: Please elaborate on your response to the previous question.

TAPS understands the desire to eliminate the RSTC review and prioritization process for FERC- and NERC-directed projects and is supportive of such fast-tracking as a concept. However, the resulting initiation process for fast-tracked projects is not reasonable as laid out in the Draft Recommendations. As proposed, following issuance of FERC- or NERC-directed SIRs, the RISC Subcommittee and NERC staff would immediately begin drafting a Term Sheet. Draft Recommendations at 17-18. As discussed in TAPS's response to Question 13, any stakeholder feedback solicited on the draft Term Sheet would be entirely at the discretion of the RISC Subcommittee. For instance, the RISC Subcommittee could "solicit stakeholder feedback . . . via written comments or a technical conference, as deemed necessary" and "may also conduct a straw poll." Draft Recommendations at 18.

The lack of mandatory stakeholder feedback on draft Term Sheets is just as unacceptable—if not more unacceptable—in the context of FERC- or NERC- directed SIRs as it is in the case of any other SIR. Given that FERC- or NERC-directed standard projects are especially likely to tackle challenging new areas or issues of first impression (for instance, large loads or Inverter-Based Resources), robust stakeholder engagement early in the process is essential to garner the understanding and consensus required to produce high-quality standards that can be fairly applied to the range of registered entities that are subject to or otherwise affected by them.

The abbreviated time the fast-track process contemplates for commenting on draft standards and for submitting Confirmation Ballots are likewise unacceptable, as discussed in greater detail in TAPS's responses to Questions 17 and 27. As suggested in those responses: (1) a minimum comment and straw poll period of 30 days should be required for fast-tracked standards for both initial and subsequent postings; and (2) a minimum posting period of 30 days should be required for the initial Confirmation Ballot for fast-tracked standards, with subsequent ballots maintaining a 30-day posting period wherever possible.

That being said, if the Term Sheet process were modified and made more robust, and the fast-track commenting and balloting periods were extended as TAPS recommends, TAPS could then support the remainder of the fast-track approach.

32) Free Response: Please share any additional feedback on opportunities to improve or clarify the proposed Reliability Standard Development process.

TAPS commends the MSPP Task Force for its efforts in producing the Draft Recommendations. Despite TAPS's serious objections to certain aspects of the proposal, the high-level framework and direction of the reforms is positive. We sincerely appreciate the Task Force's consideration of TAPS's comments. It is apparent that the Task Force has earnestly engaged with stakeholder feedback so far, and the revised proposal is much improved from the July 2025 MSPP White Paper.

Importantly, each of the concerns identified by TAPS is addressable. Indeed, TAPS has proposed concrete solutions to each issue raised in its comments that, if adopted, would resolve TAPS's concerns. TAPS urges the Task Force to adopt the recommendations laid out in these comments, each of which support the goals of creating an efficient, modern, and trusted process that facilitates the development of high-quality standards that can be fairly applied to the wide variety of entities subject to compliance.

In particular, TAPS underscores its strong opposition to the elimination of the TDUs as a distinct voting segment. As indicated in TAPS's response to Question 25, TDUs are uniquely situated and uniquely sensitive to both the costs and reliability benefits of new standards. TDUs have long been recognized by the NERC Bylaws and in the RBB as having a distinct perspective from transmission-owning LSEs. TAPS urges that the MSPP Task Force adopt the RBB Task Force's carefully considered recommendation that the individual TDU and LSE segments should be retained, but entities must elect to register for one or the other (not both). If the MSPP Task Force declines to adopt the RBB Task Force's recommendation, TAPS urges the MSPP Task Force to recommend that the Board defer action at this time and take steps to further evaluate the need for consideration of changes to the RBB segment structure after any other changes to the standard development processes are implemented.

Looking forward, TAPS urges the Task Force to continue engaging with industry and other stakeholders as it develops its Final Recommendations. TAPS also strongly recommends that the final recommendations be posted for a last round of stakeholder comments prior to presentation to the Board. This will allow the Task Force to consider any final needed tweaks to the proposal and provide a robust record for Board decision.