



Sector 8 Policy Input for the NERC Board of Trustees & Member Representatives Committee

February 3-4, 2021 Meetings

ELCON, on behalf of Large End-Use Consumers, submits the following policy input for the consideration of NERC's Board of Trustees (BOT) and the Member Representatives Committee (MRC). It responds to BOT Chair Roy Thilly's December 30, 2020 letter to Jennifer Sterling, Chair of the MRC.

SUMMARY

Large Consumers (Sector 8) are happy with NERC's post-pandemic meeting plan overall and applaud NERC's stakeholder engagement efforts during this difficult time.

- 1. Post-pandemic meeting plan.** NERC's *Post-Pandemic Board and MRC Meeting Rhythm Proposal* largely strikes an appropriate balance between in-person and remote meetings. Large Consumers ask that NERC: (1) prioritize the availability of a remote-only option for the in-person stakeholder meetings, (2) maintain adequate meeting space, and (3) allow an in-person option for all MRC meetings.
- 2. Other observations about post-pandemic, in-person or virtual meetings.** None.

Post-pandemic Meeting Plan

NERC BOT Chair Roy Thilly's December 30, 2020 letter emphasizes that stakeholder engagement is central to NERC's ability to meet its mission. Large Consumers agree with Chair Thilly's observation and encourage NERC to continue to seek creative solutions regarding stakeholder engagement. For example, ELCON appreciated the new MRC member orientation presented remotely by Kristin Iwanechko to Travis Fisher and other new MRC members. As Chair Thilly identified, remote meetings offer a lower cost of participation and easy access. The participants in the new member orientation were located in various parts of the U.S. and Canada, yet none of us purchased flights or hotel rooms to accommodate the meeting. Large Consumers have seen the same benefits in our own outreach from the "ease of access" perspective – we have been able to engage with geographically diverse stakeholders more frequently and with higher turnout than if we had required all meeting participants to travel to a single location.

Large Consumers believe NERC also correctly identifies the downside of virtual-only meetings – namely the lack of meaningful personal interactions and informal dialogue (before

and after meetings, over coffee or a meal, etc.). Personal relationships are extremely important, and Large Consumers share Chair Thilly's concern that hosting all meetings virtually will be detrimental to maintaining existing relationships, building new ones, and establishing rapport among stakeholders and NERC's staff and BOT. NERC's solution – as identified in Chair Thilly's letter and the *Post-Pandemic Board and MRC Meeting Rhythm Proposal* – seems more than reasonable, and we appreciate the opportunity to review and comment on it.

First, regarding in-person meetings, Large Consumers urge NERC to tailor its approach to the end-user. Chair Thilly's letter reads:

NERC would explore options for remote participation for those wishing to participate in that way, which would be dependent on the hotel having sufficient audio and visual support for an engaging remote experience.

Much the same as we have asked NERC to take heterogeneous preferences into account with respect to desired levels of reliability, we urge NERC to account for stakeholders' different risk tolerances regarding COVID-19. To that end, we ask that NERC make a remote-only option available for the in-person meetings. We understand that providing a remote-only option could mean changing meeting spaces to ensure the venue has sufficient audio and visual support, which might require NERC to incur higher meeting costs or a higher planning burden. However, decisions to join in-person meetings (or stay home) in this COVID-19 era are highly individual. Large Consumers think a remote participation option should be available to any stakeholder who feels attending an in-person meeting in 2021 would be too high-risk, for whatever reason. Put differently, taking a remote-only option off the table would disadvantage those stakeholders who feel they are at greater risk regarding COVID-19, which would seem to be an unfair outcome.

Second, regarding meeting space, Large Consumers ask NERC to continue to maintain adequate meeting space so that stakeholder committees have the option to meet at NERC's offices. Although NERC is taking into consideration major stakeholder committees, meeting space is particularly important for SAR and Standard Drafting Teams. As with the BOT and MRC, in-person meetings are crucial for effective and efficient development of SARs and Standards, and it can be difficult for these teams to find space to use. Although regional entity offices are an option, they too are re-evaluating their lease requirements and may cut back on space as well. NERC has said it is taking into consideration all committee meetings when evaluating its meeting space needs, but we want to reiterate the importance of the consideration of SAR and Standard Drafting Teams.

Finally, the *Post-Pandemic Board and MRC Meeting Rhythm Proposal* would have the MRC meet virtually for two of the four meetings in 2021. Large Consumers encourage the BOT to allow the MRC to meet in person for all four meetings, consistent with its approach for the BOT, with a virtual option for those who are uncomfortable or unable to attend in person. Large Consumers believe it's important that in-person MRC meetings be considered (with a virtual option for other stakeholders), similar to the BOT, for the reasons identified in Chair Thilly's letter. Placing MRC members in a virtual-only meeting for two of the four 2021 meetings would limit MRC members' choice and reduce the potential for relationship building among MRC members.

Thank you for your consideration.