



Sector 8 Policy Input for the NERC Board of Trustees & Member Representatives Committee November 5, 2019 Meetings in Atlanta, Georgia

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 Chairman Roy Thilly's October 2, 2019 letter to Greg Ford, Chair of the MRC. Replacing the NERC Critical Infrastructure Protection Committee (CIPC), Operating Committee (OC), and Planning Committee (PC) with a single committee is a challenging undertaking. Large Consumers appreciate the efforts of the stakeholder engagement team (SET) to revise the proposal for the transition to the Reliability and Security Technical Committee (RSTC), especially the participation model and transition timeframe.

SUMMARY

- **Revised proposal for the RSTC** — Large Consumers reiterate the challenges of a functional unit that includes CIPC in addition to OC and PC expertise. However, Large Consumers appreciate that the proposal acknowledges the vast breadth of skills and expertise needed to encompass such wide-ranging fields and that the RSTC composition must include this overall, rather than expect each individual to provide it across all fields.
- **Proposed participation model of the RSTC** — Large Consumers applaud the adjustment to include two representatives per sector and insist this provision remain in place. Large Consumers agree that for purposes of having adequate participation, a sector seat can be converted to an at-large seat on a temporary basis only. However, sector balance must remain an objective during the selection process for any such residual at-large seats.
- **Proposed RSTC Charter** – Large Consumers support the scope of the RSTC charter as outlined in the proposal.
- **RSTC transition plan and timeline** – Large Consumers support a timeline extension and stress that as implementation occurs any subsequent timeline adjustments should be considered to ensure quality is not sacrificed for expediency.

Revised Proposal for the RSTC

Large Consumers believe integrating planning and operating expertise is a more natural fit but including security may stretch the ability of the RSC to function effectively across all three subject matter areas. The process to disassemble standing committees and reorient subcommittees must be mindful of intended and unintended consequences. Standing committees have unique cultures, areas of expertise, and processes that reflect much fine-tuning over the years. These insights, along with transferring other forms of institutional knowledge, warrant careful consideration through a careful RSTC implementation process. Integrating disparate forms of expertise has benefits in a matrix format but the challenges may vary unevenly across different subject matter combinations.

Large Consumers support the improvements in criteria in the participation model, such as not requiring executive experience. Individual requirements should be lax to maximize the flexibility to select specialized expertise for the RSTC as a whole. Unnecessary criteria may preclude the ability to select the optimal composition of the RSTC, which may consist of numerous specialists that do not have much breadth of expertise but are key role players in the RSTC.

Proposed Participation Model of the RSTC

Large Consumers applaud the adjustment to include two representatives per sector and insist this provision remain in place. Large Consumers agree that for purposes of having adequate participation, a sector seat can be converted to an at-large seat on a temporary basis only. However, sector balance must remain an objective during the selection process for any such residual at-large seats. Large Consumers are concerned that, without this provision, sector representation will become skewed and undermine the intent of efforts to revisit the RSTC proposal to provide balance in sector representation.

RSTC Transition Plan and Timeline

Large Consumers support a timeline extension. As implementation progresses, any subsequent timeline adjustments should be considered to ensure quality is not sacrificed for expediency. In particular, avoiding performance disruptions in the transfer to the RSTC may require extended parallel operations with CIPC, OC, and PC. This may necessitate conditions under which the planned June 2020 disbandment of the CIPC, OC, and PC is modified. Anticipating such conditions now will make for easy contingency management in spring and summer 2020, if necessary.

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