ELCON
Electricity Consumers Resource Council

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

November 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 Ken Defontes, Jr.'s September 29, 2021 letter to Paul Choudhury, Chair of the MRC.

SUMMARY

Large Consumers (Sector 8) support efforts by NERC to improve the agility and efficiency of the ERO Enterprise. The BOT requested MRC input on the following questions:

1. **Do you agree that more nimble ERO Enterprise programs are desirable with the rapid changes occurring in the electricity sector?** Yes. Large Consumers recognize the benefits of nimble programs within the ERO Enterprise given the rapid changes in the industry. However, we ask that any improvements regarding speed or efficiency of work processes not come at the expense of work quality.

2. **Where do you see opportunities for exploring new ways of working and making processes more efficient and agile?** Large Consumers see opportunities for sharing learned experiences among standing committees and task forces, particularly in an era of increased virtual meetings.

Improving Agility Given Rapid Industry Changes

Although Large Consumers acknowledge the large and rapid changes in the electricity industry, we ask that the ERO Enterprise ensure that quality is not sacrificed for expediency. Some ERO Enterprise processes stretch over multiple years, and we find the deliberate pace of much of the ERO Enterprise's work to be appropriate given the significant impact of the work and the number and variety of stakeholders involved.

Large Consumers commend the ERO Enterprise's ability to stand up task forces as needed to address specific issues, such as the Energy Reliability Assessment Task Force (ERATF) and the Facility Ratings Task Force (FRTF). Both the ERATF and FRTF have important and timely roles to play in the ERO Enterprise's work, and the existing practice of leaning on task forces to focus on emerging issues appears to be sufficient to contend with the rapid changes in the industry.

Improving Efficiency

Large Consumers also commend the ERO Enterprise for continuing its important operations in a virtual-only environment due to the ongoing pandemic. One stumbling block that has emerged in the virtual setting is the procedure for counting votes in standing committee meetings in which some members are present (virtually) but do not log a vote. In particular, the Reliability and Security Technical Committee (RSTC) voting rules may be an area for improved efficiency given the ongoing debate over such rules, which distracts time and attention away from substantive issues.

What's the solution? Large Consumers recognize that the ERO Enterprise cannot simply mandate uniform voting rules across all standing committees. We propose that NERC work with stakeholders towards a long-term goal of harmonizing the governance elements within the charters of its standing committees. Large Consumers voted to approve the RSTC charter, and we are committed to fulfilling our obligations as part of the RSTC. To the extent that other standing committees can learn from the RSTC experience with virtual voting (or vice versa), we encourage NERC to share experiences and learning across standing committees and task forces.

Finally—where feasible and practical—we ask that NERC attempt to make rules for vote counting and other parliamentary matters more uniform across the ERO Enterprise. The substantive work of these groups is too important to get bogged down in internal procedural issues.

Thank you for your consideration.