

**Lettre émise par la NERC
(version anglaise)**

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Dear Ms. Mazza:

As the NERC Compliance Guidance program administrator, I am writing this letter, per your request, to highlight key points we discussed on Friday January 13, 2023 regarding Implementation Guidance (IG). The following information is publicly available on the NERC Compliance Guidance web page.

Implementation Guidance is one of the two components of the NERC Board of Trustees approved *Compliance Guidance Policy*; CMEP Practice Guides are the second component. Implementation Guidance provides a means for registered entities to develop examples or approaches to illustrate how registered entities could comply with a standard that are vetted by industry and endorsed by the ERO Enterprise. The examples provided in the Implementation Guidance are not exclusive, as there are likely other methods for implementing a standard. The ERO Enterprise's endorsement of an example means the ERO Enterprise CMEP staff will give these examples deference when conducting compliance monitoring activities. Registered entities can rely upon the example and be reasonably assured that compliance requirements will be met with the understanding that compliance determinations depend on facts, circumstances, and system configurations. Industry develops Implementation Guidance through Pre-Qualified Organization (PQO) or Standard Drafting Teams (SDT). Development, or use of, Implementation Guidance is not mandatory.

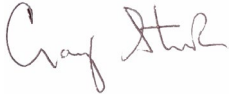
NERC has developed several tools to assist in the development of Implementation Guidance, including the *Implementation Guide Development and Review Aid*. This tool provides key practices to be considered during the development of Implementation Guidance, including practices which will result in automatic non-endorsement or increased risk of non-endorsement. Implementation Guidance developers not utilizing this tool is a primary reason for the majority of non-endorsements. Another primary reason for some recent non-endorsements is the Standard Drafting Teams submitting legacy Guideline and Technical Basis (GTB) and Technical Rationale (TR) documents as Implementation Guidance when they do not meet the definition, nor intent, of Implementation Guidance. That being said, when proposed Implementation Guidance is not endorsed by the ERO Enterprise, it has no impact on the adoption of the relevant

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Reliability Standard(s) and Applicable Governmental Authorities should consider the standards based on their reliability merits independent of the Implementation Guidance.

Again, the information stated above is publicly available on the NERC Compliance Guidance web page. Do not hesitate to contact me if additional information is required. Thank you.

Sincerely,



Craig Struck
Senior Auditor

cc: Mr. Kiel Lyons, NERC
cc: Mr. Hugo Perez, NERC