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Advice of the WIRAB to the NERC Board of Trustees on the Final Recommendations of the Modernization of Standards Processes and Procedures Task Force

February 5, 2026

The Western Interconnection Regional Advisory Body (“WIRAB”) appreciates the opportunity to submit advice to the North American Electric Reliability Corporation (“NERC”) Board of Trustees on the Final Recommendations of the Modernization of Standards Processes and Procedures Task Force (“MSPPTF”). WIRAB is a regional advisory body created on petition by the Governors of the Western States and pursuant to Section 215(j) of the Federal Power Act. WIRAB is authorized under Section 215(j) to provide advice to the Federal Energy Regulatory Commission (“FERC” or “Commission”), the Electric Reliability Organization (“ERO”) (i.e., NERC), and the Regional Entity (i.e., Western Electricity Coordinating Council (“WECC”)) on reliability standards and associated matters in the Western Interconnection. WIRAB’s state and provincial representatives are primarily Public Utility Commissioners and state Energy Office Directors who understand the importance of interconnection-wide reliability and who are deeply engaged in studying and responding to potential reliability implications associated with the rapidly changing resource mix in the West.

Background

In February 2025, the NERC Board of Trustees passed a resolution establishing an industry-led MSPPTF to undertake a strategic review of NERC’s Reliability Standards development process.¹ The Task Force was directed to examine opportunities to improve the efficiency, transparency, and responsiveness of standards initiation, development, and approval processes in light of evolving Bulk Power System (“BPS”) reliability risks and recent challenges in timely standards development.

In July 2025, the MSPPTF released a whitepaper titled *Modernization of Standards Processes and Procedures*, which outlined potential structural and procedural reforms to NERC’s existing standards framework.² WIRAB Staff reviewed the whitepaper and submitted written comments to the Task Force

¹ *Meeting Minutes - Board of Trustees*. February 13, 2025. <https://www.westernenergyboard.org/wp-content/uploads/2018/01/01-24-18-WIRAB-Comments-on-2017-ERO-RISC-Report-1.pdf>

² *Request for Feedback: Potential Options for Transforming the Reliability Standards Development Framework*. July 2025. <https://www.nerc.com/globalassets/our-work/reports/white-papers/mspptf-white-paper---july-2025.pdf>

on August 27, 2025.³ In its comments, WIRAB Staff expressed general support for efforts to promote transparency and facilitate early consensus, and cautioned against unclear or overlapping committee roles that could introduce inefficiencies across the standards development lifecycle. WIRAB Staff encouraged the MSPPTF to consider mechanisms for earlier and more informal stakeholder engagement during the standards development process, such as the use of straw polls or other non-binding feedback tools, to identify areas of consensus or concern prior to formal comment and balloting periods. In addition, with respect to standards balloting, WIRAB Staff expressed general support for efforts to broaden industry participation, improve voter accountability, and ensure procedural equity.

Consistent with WIRAB's statutory advisory role, WIRAB Staff emphasized that any modifications to NERC's standards processes and procedures should remain aligned with the requirements and principles set forth in Section 215 of the Federal Power Act, including transparency, due process, and accountability within the reliability standards development framework.

WIRAB continued to monitor the activities of the MSPPTF as draft recommendations were developed and refined and appreciates the opportunity to provide comments on the Final Recommendations. WIRAB offers the following advice to inform NERC's consideration of potential modifications to the reliability standards development process.

WIRAB Comments and Recommendations

WIRAB supports modernization of the standards development process as a necessary step to strengthen system-wide reliability, provided reforms preserve the primacy of reliability outcomes over procedural efficiency.

WIRAB supports efforts to modernize the standards development framework and recognizes the reliability value of a more predictable, transparent, and disciplined process. Improvements that enhance clarity at the outset of standards work and provide earlier and more meaningful stakeholder engagement can strengthen the ability of the standards process to respond to emerging reliability risks.

WIRAB cautions that procedural efficiency is not itself a reliability outcome. Reforms that prioritize speed, consolidation, or process simplification at the expense of technical rigor, informed scoping, or robust review risk weakening the quality and durability of standards and undermining stakeholder confidence in the process. Any reforms adopted by the Board of Trustees should be evaluated by their impact on the effectiveness of resulting standards, not solely by reductions in timelines or procedural steps. Accordingly, WIRAB supports the use of performance metrics to evaluate whether modernization efforts are achieving their intended reliability benefits.

³ *Memo to WIRAB regarding WIRAB Staff Comments on the MSPPTF Whitepaper*. September 2025.
https://www.westernenergyboard.org/wp-content/uploads/MEMO_NERC-MSPPTF-Whitepaper_WIRAB-Staff-Input.pdf

WIRAB recommends that the NERC Board of Trustees ensure reforms to the standards development process explicitly require sustained use of regionally relevant technical expertise so that emerging reliability risks are properly prioritized and addressed.

The Western Interconnection faces distinct reliability challenges, including geography challenges, high penetrations of inverter-based resources, complex expansion of regional organizations, including centralized energy markets, and rapidly evolving load and resource profiles. Processes and procedures for standards development that do not adequately incorporate regional expertise risk underprioritizing or mischaracterizing these risks. WIRAB therefore urges NERC to ensure that new rules and engagement requirements governing the standards development process formally require meaningful regional input and clearly define how such expertise informs risk prioritization, project scoping, and standards development decisions. Formalizing these expectations is necessary to ensure consistent application.

WIRAB cautions that accelerated standards pathways should be narrowly applied and must preserve meaningful technical review and stakeholder engagement.

WIRAB acknowledges that expedited standards development may be warranted in limited circumstances, such as in response to directives from the NERC Board of Trustees or the Federal Energy Regulatory Commission. However, accelerated pathways should not constrain the ability of stakeholders to evaluate technical implications, regional impacts, and implementation feasibility.

Compressed timelines can disproportionately affect regions with complex system characteristics or unique operational constraints. WIRAB emphasizes that Fast Track or similar processes must retain sufficient opportunity for technical review and engagement to ensure standards are durable, implementable, and effective across all Interconnections. To deliver its intended purpose and maintain credibility, a Fast Track or similar process must establish clear expectations for timelines, milestones, and accountability for prioritization decisions, project scope, and progression from directive to ballot.

WIRAB Advice

WIRAB advises the NERC Board of Trustees to proceed with modernization of the Reliability Standards development process in a manner that strengthens transparency, predictability, and encourages early stakeholder engagement, while preserving technical rigor, regional expertise, and due process as core elements of reliability outcomes. WIRAB cautions that accelerated or streamlined standards pathways should be applied narrowly and evaluated based on their ability to produce durable, effective standards that address high impact reliability risks, rather than solely on procedural efficiency or timeline reductions.