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Advice of WIRAB to the NERC Board of Trustees on the Draft Governance Guidelines for NERC Standing Committees

September 4, 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 draft Governance Guidelines for NERC Standing Committees and accompanying sample Standing Committee charters, developed by NERC’s Corporate Governance and Human Resources Committee (“CGHRC”) as part of its Standing Committees Governance Initiative. 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 electricity system in the West.

Background

NERC’s five Standing Committees—the Standards Committee (SC), the Reliability and Security Technical Committee (RSTC), the Reliability Issues Steering Committee (RISC), the Compliance and Certification Committee (CCC), and the Personnel Certification Governance Committee (PCGC)—are Board-created bodies of volunteer stakeholders that provide subject matter expertise in support of NERC’s mission.¹

In August 2024, CGHRC directed NERC staff to work with Standing Committee leadership to launch a self-assessment of governance practices across the five Standing Committees; leadership presented the results to the Board in February 2025.² The self-assessment identified a need for clearer delineation of the roles of Standing Committee members, the Board, and NERC staff, and for greater consistency in governance practices across committees whose charters had developed independently over time.

¹ NERC, Corporate Governance and Human Resources Committee Open Meeting Agenda Package, February 11, 2026, at 6 (Standing Committees Governance Guidelines Background).

² NERC, Corporate Governance and Human Resources Committee Open Meeting Agenda Package, February 11, 2026, at 6 (Standing Committees Governance Guidelines Background).

In response, NERC staff developed draft Governance Guidelines that consolidate membership composition, officer structure, subordinate group governance, and meeting procedures into a single document applicable to every Standing Committee, modeled on the governance guidelines already used by the NERC Board and the Member Representatives Committee (“MRC”). The draft Guidelines were first presented to CGHRC in February 2026.³

This effort is separate from, but will ultimately be merged with, charter revisions arising from the Modernization of Standards Processes and Procedures (“MSPP”) Task Force recommendations, which assign new responsibilities to the RISC and RSTC and create a new body to oversee the Reliability Standards process. NERC intends to combine three streams of change—Governance Guidelines updates, MSPP-driven revisions, and each committee’s own annual charter review—into a single final charter per Standing Committee.

NERC has posted the draft Governance Guidelines, along with sample Standing Committee charters, for stakeholder comment, with written comments due September 4, 2026. Based on stakeholder feedback received since the February 2026 proposal, CGHRC has revised the draft to remove proposed term limits on individual and organizational membership, retaining a limit of a single two-year term for officer positions only, and to lower the voting threshold required to approve Standing Committee actions from two-thirds to a majority of votes cast. NERC anticipates finalizing the Governance Guidelines by December 2026. WIRAB offers the following comments on the draft Governance Guidelines for NERC’s consideration.

WIRAB Comments and Recommendations

WIRAB recommends that NERC establish regional and interconnection-specific expertise as an explicit Standing Committee membership and subordinate-group staffing consideration.

Section 2(a) of the draft Governance Guidelines organizes Standing Committee membership by stakeholder sector to help ensure balanced decision-making and “fair and equitable representation,”⁴ but contains no comparable requirement addressing geographic or interconnection diversity. A Standing Committee can satisfy every sector-balance criterion in Section 2(a) while having no member with direct exposure to the operating conditions, market structures, or reliability risks of an affected region or region-specific stakeholders.

Sector balance and regional balance are not interchangeable. Standing Committee determinations made without interconnection-specific expertise risk overlooking reliability considerations distinct to the West, consistent with the reliability implications WIRAB was created to help identify and evaluate on behalf of the Western States and Provinces.

³ NERC, Corporate Governance and Human Resources Committee Open Meeting Agenda Package, February 11, 2026, at 6 (Standing Committees Governance Guidelines Background).

⁴ NERC, Corporate Governance and Human Resources Committee Open Meeting Agenda Package, February 11, 2026, Governance Guidelines for Standing Committees §2(a) (Standing Committees Membership Composition).

*WIRAB advises NERC to amend Section 2(a) of the draft Governance Guidelines to identify regional and interconnection-specific expertise as a consideration for Standing Committee membership and for subordinate subcommittees, working groups, and task forces, alongside the existing sector-balance criteria. Specifically, WIRAB suggests the following addition to Section 2(a), Membership Composition: "Charters will organize membership by sector or on a basis required by the Rules of Procedure, unless the Board appoints certain members based on their particular expertise as necessary, and will determine the number of at-large members needed for that Standing Committee to ensure fair and equitable representation, **including representation of regional expertise.**"*

WIRAB recommends that NERC establish a mechanism to monitor and report on Standing Committee membership turnover as well as geographic and sector representation over time.

As first proposed in February 2026, the draft Governance Guidelines required the affirmative vote of two-thirds of votes cast to approve Standing Committee actions and limited individual and organizational membership to two terms, absent a Board exception. Since that proposal, CGHRC has lowered the voting threshold to a majority of votes cast and removed the membership term limits described above.⁵

A lower voting threshold and the removal of membership term limits, considered together, remove two independent safeguards against durable control of Standing Committee actions by a narrowing set of repeat members. Neither the draft Guidelines nor the accompanying sample charters establish a mechanism by which NERC or stakeholders could evaluate whether that risk is materializing in practice.

For the Western Interconnection, where Standing Committee representation may depend on a small number of individuals, a decline in regional representation could occur without notice. A reporting mechanism would allow NERC to confirm that consolidating governance practices has, in fact, preserved the balanced and representative decision-making these Guidelines are designed to protect.

WIRAB advises NERC to require that each Standing Committee report periodically to the Board on membership turnover as well as on geographic and sector representation, so that NERC and its stakeholders can evaluate whether the combined effect of the revised voting threshold and the removal of membership term limits affects the durability of regional and sector viewpoints on Standing Committee actions.

⁵ NERC, Corporate Governance and Human Resources Committee Open Meeting Agenda Package, February 11, 2026, Governance Guidelines for Standing Committees §2(b) (Term of Membership) and §5(b) (Voting), as first proposed to CGHRC.

WIRAB Advice

WIRAB advises the NERC Board of Trustees to identify regional and interconnection-specific expertise as a Standing Committee membership consideration and to establish a mechanism for monitoring and reporting on Standing Committee membership turnover and geographic and sector representation over time. These changes are necessary to ensure that Standing Committee governance accounts for the operating and reliability characteristics of every region NERC serves, including the Western Interconnection, and that the durability of regional and sector representation can be evaluated as Standing Committee membership and voting rules evolve.