



NORTH AMERICAN ENERGY STANDARDS BOARD

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November 9, 2009
comments electrically submitted¹ and emailed to Dr. Arnold

Dr. George Arnold
Deputy Director
National Institute of Standards and Technology
100 Bureau Drive, Stop 8100
Gaithersburg, MD 20899-8100

RE: Request For Comments on Draft National Institute of Standards and Technology Framework and Roadmap for Smart Grid Interoperability Standards, Release 1.02, [Docket Number 0909291327–91328–01]

Dear Dr. Arnold,

NAESB appreciates the opportunity to offer these comments to on “Draft National Institute of Standards and Technology Framework and Roadmap for Smart Grid Interoperability Standards, Release 1.0.” We offer the following general suggestions for consideration, and rather than comment on specific standards or specifications recommended by NIST, we are providing these remarks for the overall draft.

The groups that are assigned tasks to develop standards through the priority action plans should demonstrate transparency, inclusion, balance and a documented and accessible process. Ensuring the broadest level of inclusion, balance of interests, transparency in all aspects and easily accessible documentation on the process strengthens the work products and supports building industry consensus – crucial when the work products are intended to be forwarded to regulators for their consideration.

- **Transparency.** Transparency in decision making is a key factor in garnering support. Transparency includes both the identification of the decision makers and how decisions were made. Transparency applies to standards development, standards selection and it also applies to the development of the plans and strategies. While providing adequate transparency can take time, it has been our experience that it expedites industry acceptance and support.
- **Inclusion.** Stakeholders should be given the opportunity to take part in the decision making and standards development. Reaching out to trade associations and industry organizations to encourage their stakeholders to participate has proven essential in assuring that diverse groups are made aware of the planned standards development activities. Trade associations, industry organizations, regional groups and the industry itself play key role in soliciting a broad and regionally diverse group of participants. Regulatory staff, both state and federal should be encouraged to participate to ensure that directions taken support their policies.

¹ The Federal Register notes that electronic comments on the overall draft and the contents of chapters 1–3 and 5–7 may be sent to: nistsgframeworkcomments@nist.gov, and electronic comments on the 15 additional standards in chapter 4 and tables 2 and 3 can be sent to nistsgstandardscomments@nist.gov.

² The entire draft version of the NIST Framework and Roadmap for Smart Grid Interoperability Standards, Release 1.0 (Draft), is available at: http://www.nist.gov/public_affairs/releases/smartgrid_interoperability.pdf.



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- Balance. Decision making, particularly for standards that have broad applicability, should not only include the stakeholders who will be responsible for modifying their business processes to implement the standards, but also the service providers. The market interests should be balanced and there are a number of ways in which this balance can be achieved. Balance of geographic areas can be important when the decisions made or the standards developed are not specific to a given region, but rather are intended to apply more broadly. Equally important, those entities either politically accountable for the success or operationally accountable for the success of the standards and related decisions must have a strong voice in the overall planning and strategic sessions, and also in the identification of standards needed, the development of the standards and the ultimate adoption of the standards.
- Documented and Accessible Process. Participants should have access to the process by which the standards are developed and also the process by which related decisions are reached. Importantly, an appeal process should be defined not only as it pertains to endorsement of standards, but also to the standards development process itself.

As a separate issue, for section 2.3.3, "Different Layers of Interoperability," NAESB has found that it is helpful to first develop the organizational or policy/regulation driven standards, followed then by the informational standards supportive of the policies and technical standards to provide a full work product for implementation. Informational and technical standards may have assumptions embedded that may be inconsistent with policies and can cause significant rework.

We look forward to continuing to participate in your process and the upcoming meetings in Denver on November 16-19, 2009, and we are grateful for the opportunity to contribute as co-leaders for priority action plans 3, 4 and 9.

With Best Regards,

Rae McQuade

Rae McQuade, President, NAESB

cc: Ralph Cleveland, Chairman of the NAESB Board of Directors
Michael D. Desselle, Wholesale Electric Quadrant Vice Chairman of the NAESB Board of Directors
William P. Boswell, NAESB General Counsel
Jonathan Booe, NAESB Counsel