

Agenda item #3 - thoughts for our call tomorrow
Email from David McAuley -- 6 Dec 2017

Dear members of the IRP IOT:

As mentioned in agenda item #3 for our call on Thursday, we should begin discussions on plans to wind up work on public comments to the Updated Supplementary Procedures.

In this email I want to invite your thoughts/comments for items noted below -and also on matters I may have overlooked that you wish to raise in the effort to conclude work on the rules.

Two important considerations:

1. On our report on public comments:

On our last call, I expressed a hope to get revised draft rules to the board in the Jan/Feb timeline. I should instead have spoken in terms of our report rather than the rules themselves given that Sidley will actually draft the revised rules and may need some time to turn our directions into specific language. And that process almost invariably raises a few questions we may have to address along the way.

The point is – we need to do a crisp, comprehensive report to give Sidley direction and we may need to convene meetings on fairly short notice if we receive questions from Sidley.

I will be happy to take the lead on writing up this report but, as usual, I would also welcome volunteers to join in this effort.

On the way to finalizing the report, we should have a dedicated opportunity (on list and a specific meeting) for all of us to comment – on the internal consistency and comprehensiveness of the report – not unlike the “consistency” review planned for the CCWG Accountability WS2 final report that draws together all subgroup reports.

2. On need for public comment:

I have been of the mind that we may not need another round of public comment. On further reflection, while much of what we are doing is “tweaking” the draft rules (at least in my opinion as a participant), we have made what can reasonably be considered a material change on timing, and perhaps will in other areas.

It seems to me that we will need to allow the public to weigh in on those changes that we deem material – but not other changes we recommend in our report.

I am hoping we can get the report out in early February – better yet, in January.

The new IRP proposed by the CCWG Accountability needed three important “gating” events to take place to be fully in place:

1. Adoption of the new bylaw – done in October 2016;
2. Revised supplementary procedures – nearing conclusion; and
3. Establishment of the Standing Panel – work needed, importantly including helping SOs/ACs organize to fill their role.

So, I welcome on the call your thoughts in these regards, as well as an update from Sam or Liz on the preparatory work for the standing panel.

Many thanks for your participation, it is for a most worthy goal.

Best regards,
David