November 14, 2018

To: AWEA Wind Standards Environmental, Health, and Safety Standards Committee, AWEA Wind Technical Standards Committee, and AWEA Wind Workforce Standards Committee

From: Michele Mihelic, AWEA, Secretariat AWEA Wind Standards Committees

CC: Tom Vinson, AWEA
    Sabrina, AWEA


Dear AWEA Wind Standard Committee Members:

As you are aware, the American National Standards Institute (ANSI) audited the American Wind Energy Association (AWEA) and the consensus body of the AWEA Wind Technical Standards Committee (WTSC – formerly the AWEA Wind Standards Committee) on their adoption of the ANSI/AWEA Small Wind Turbine Standard (2016), which started in April 2018 and concluded with AWEA’s final response on August 24, 2018. Please let us know if you have any questions of the below summary of the audit report.

For your review - please find the attached AWEA Standards Development Procedures revision as a result of the ANSI Audit. Please provide comments by December 21, 2018. The anticipated approval ballot will be sent to all AWEA WSC in January 2019 for final approval of the AWEA SDP revisions (2019).

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AWEA was audited by ANSI starting in April 2018 on AWEA’s first published American National Standard (ANS): ANSI/AWEA Small Wind Turbine Standard (ANSI/AWEA SWT-1(2016)).

History:

American Wind Energy Association (“AWEA”) has been an ANSI-accredited standards developer since 1995. AWEA had staffed the standards development activities for both the American National Standards and the US representative to the IEC TC 88, which is the international design standards body for wine energy. AWEA relinquished the administration for the US TAG IEC TC88 work stream in 2017.

AWEA transitioned staff managing the standards development process in December 2012 to the current lead. During the transition of staff, a request for all standards development documentation was made. It appears that the prior staff manager did not maintain any
documentation. AWEA, also, recognized the Standards Development Procedures had not been updated since 1995. Staff was in the midst of updating the procedures during the transition of staff. The new AWEA staff lead further revised the procedures to ensure consistency with ANSI essential requirements, secured committee approval and submitted the revised procedures to ANSI in 2015. ANSI approved the procedures in April 2015.

Audit process:

The audit involved a review of AWEA’s operations and adherence to the AWEA standards Development Procedures (2015). This was AWEA’s first audit and based upon criteria administered by the Director of the ANSI Standards Developer Audit Program, one standard was selected for this audit (SWT-1). The audit took into consideration the practices and actions, records and reports of AWEA in implementing its accredited procedures to ascertain compliance with the ANSI Essential Requirements.

ANSI Audit Report Findings:

ANSI’s final report noted both areas of administration errors and concern, but also where AWEA successfully administered the program. While ANSI found AWEA complies with our procedures in several ways, ANSI also found AWEA’s procedures and implementation of our procedures deficient in several areas with respect to development and adoption of SWT-1.

In summary, ANSI:

- Recommended a number of specific revisions to our procedures (i.e. citing specific paragraph numbers and language to remove or edit);
- Noted several examples of missing documentation, including with respect to project initiation, establishment of the subordinate group, approval of membership in the subordinate group, annual roster distribution, and comment resolution;
- Advised that the numerical consensus described in AWEA’s procedures was not met;
- Raised concerns about inconsistency in applying the procedures as written and consistent with ANSI requirements. For example, clearly notifying members whether a re-circulated ballot triggers a new vote and prior votes do not count; and
- Identified errors in the PIN form and BSR forms submitted by AWEA.

ANSI requires revisions to AWEA’s Standards Development Procedures and standards development process.

AWEA response:

As required by ANSI, AWEA staff responded point-by-point to ANSI’s final audit report on Friday, August 24, 2018. AWEA acknowledged the deficiencies raised by ANSI and accepted each of the recommendations. AWEA noted that implementation of the Kavi standards management software in 2016 should avoid some of the challenges they identified. AWEA noted that we were already in the process of updating our procedures again, put that on hold per ANSI’s request pending the final audit, and will now take back up the update and finish the revisions consistent with the ANSI audit findings (including clarifying the definition of numerical consensus) and submit to our consensus bodies before the end of
the year for consideration. AWEA committed to addressing some of the recommendations through drafting of standard operating procedures defining how we implement key provisions of our procedures. And, AWEA expressed an interest in additional ANSI training for staff in certain areas.

AWEA plans to submit an update to ANSI by the end of the year on our progress toward addressing the deficiencies they identified.

AWEA is also doing an internal audit of our other approved standards to identify whether any of the other development and adoptions have similar challenges to those ANSI identified with respect to the SWT-1. This will give us a sense of what we can correct now (for example, locating any missing documentation), and, depending on ANSI’s response to the audit results (see below), we can assess any additional necessary steps based on our internal review to address any deficiencies we identify in the development and/or adoption of the other standards.

Next steps:

AWEA staff participated in the final ANSI Audit Report conference call with ANSI staff reviewing the audit results and the next steps of the ANSI audit. ANSI stated that the report and AWEA response will most likely not receive a final determination until January 2019. The ANSI Executive Committee’s next meeting was in September; however, they were not be able to get all of our information into the committee for their review and as such, consideration will be delayed until their next meeting in January 2019.

ANSI has several options for their response to the audit. ANSI could:

1. Pull our accreditation. ANSI has pulled the accreditation of SDOs (Standard Development Organization) only three times in their history. While this is a possibility, the auditor stated that it would be highly unlikely because we are a new standards developer, there is an expectation for mistakes by new SDOs and because of our willingness to learn from our mistakes.
   a. In the event that our accreditation is pulled, AWEA will need to reapply for accreditation, which will require an application, submission of the organization’s procedures and a fee of $5,000.00

2. Suspend our accreditation, which would mean that we will not be able to approve, or ballot any standards activities until the suspension is lifted. There will be steps and requirements that we will need to perform to have our suspension lifted, which will be most likely a revision of the procedures and corrective actions of process. This is possible outcome is one of the reasons we want to submit an update to ANSI by the end of the year on steps we’ve taken to address their recommendations.

3. Remand our standard (SWT-1), which means pull the standard and request that we redo the process to ensure that we have followed all of the steps correctly. They would also most likely then require another audit the next year.
4. Lastly, they may do nothing and request that we revise our procedures moving forward. We would most likely need to go through an additional audit the following year.

Next Steps: AWEA will need to revise the procedures with inclusion of the ANSI Audit Final Report recommendations within 6-months of the report submission (July 27, 2018), which would be January 2019. We have committed to ANSI that procedures will be revised by January 2019.

AWEA staff reviewed all WSTC documentation for the remaining 5 published standards. Any documentation that is missing is being identified, found, or recreated/redone. Several emails have been lost to AWEA’s email retention policy (which automatically deletes any emails older than 6-months – we have subsequently been given an exception to that rule for the standards emails account), we have work to work with IT on pulling the back-ups, if possible. A few of the AWEA standards may need to be withdrawn and go through the standards process again because of the documentation issue and the numerical consensus issue, however, ANSI recommended that we hold withdrawing the standards until the EXSC makes their final decision.

In Michele’s discussion with the auditor, he stressed that AWEA is the Secretariat and the administrator of this process. As the administrator we cannot influence the content, however, staff is ultimately responsible for the standards development process and must ensure that each step in the process is met. Secondly, the auditor mentioned that each organization struggles with the process, as it is very detailed oriented, and process driven. This process is time consuming, even with experience, practice and tools implemented to assist. The Auditor also recommended that AWEA remove detailed requirements, as the more detailed the procedures – the more likely a mistake will be made and failure of the audit.

Moving forward, all AWEA WSC and their subordinate groups must strictly adhere to the procedures. AWEA staff will develop a Standard Operating Process (SOP) to assist in navigating the process. AWEA staff will also develop templates for standard language and communication needs. These documents will be made available by December 2018.

For your information:
AWEA has 6 published standards:
- ANSI/AWEA 61400-23 (2017): Full Scale Structural Testing of Rotor Blades

The *signifies that we may need to withdraw the standard and redo it.
ANS under development – 10 standards/Recommended Practices being developed. Each subordinate group is meeting monthly to develop content for their respective scopes, as each subordinate group finalizes their scope and content for their standard, staff will process each step with its coordinating ANS requirement

- Technical Standards -
  - TR-1: Wind Plant Power Performance
  - OCRP: Offshore Recommended Practices (5)
  - Structures and Foundations
  - National Adoption of the IEC 61400-1 standard

- Workforce related
  - Wind Technician Entry Level
  - Wind Workforce Definitions

- Safety Standards
  - Wind Safety Standard

ANS activities, current exploratory on type of standard development needed (Recommended Practice, Technical Report, ANS, or not needed because other standards exist), each of these subordinate groups will make a recommendation to their respective consensus bodies on their recommendation. If a recommendation to pursue a document is made, they will propose a scope for development to initiate the ANS process:

- Safety related:
  - Service Lift
  - Offshore Safety
  - Repower and Decommissioning
  - Rescue and self-evacuation
  - Remote and lone work

- Technical and Design related:
  - Lightning Protection

Also attached is a more detailed timeline of steps AWEA staff is taking to implement corrections to the audit findings. Please feel free to reach out to me with any questions or clarifications.

Thank you,

Michele Mihelic
Director, Asset Management and Standards Development, Secretariat, AWEA Wind Standards Committees
American Wind Energy Association