Project 2013-02 Retirement of Reliability Standard Requirements

### Unofficial Comment Form for Paragraph 81 (P81) Project —Retirement of Reliability Standard Requirements

**This form is provided in a Word format for the development of your internal drafts only.**

**Please use** the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=5924c4614dd548a5998ee4c01d3a191e) located at the link below to submit official comments on the P81 Project. Comments must be submitted by **September 4, 2012.** If you have questions, please contact Kristin Iwanechko at [Kristin.Iwanechko@nerc.net](mailto:Kristin.Iwanechko@nerc.net) or by telephone at 404-446-9736.

### <http://www.nerc.com/filez/standards/Project2013-02_Paragraph_81.html>

### Background Information:

On September 30, 2011, the North American Electric Reliability Corporation (NERC) filed a petition with the Federal Energy Regulatory Commission (FERC) requesting approval of its proposal to make informational filings in a “Find, Fix, Track and Report” (FFT) spreadsheet of lesser-risk, remediated possible violations of Reliability Standards.   On March 15, 2012, the FERC issued an order conditionally accepting NERC’s FFT proposal. In paragraph 81 (P81) of that order, the FERC also that stated:

The Commission notes that NERC’s FFT initiative is predicated on the view that

many violations of requirements currently included in Reliability Standards pose lesser

risk to the Bulk-Power System. If so, some current requirements likely provide little

protection for Bulk-Power System reliability or may be redundant. The Commission is

interested in obtaining views on whether such requirements could be removed from the

Reliability Standards with little effect on reliability and an increase in efficiency of the

ERO compliance program. If NERC believes that specific Reliability Standards or

specific requirements within certain Standards should be revised or removed, we invite

NERC to make specific proposals to the Commission identifying the Standards or

requirements and setting forth in detail the technical basis for its belief. In addition, or in

the alternative, we invite NERC, the Regional Entities and other interested entities to

propose appropriate mechanisms to identify and remove from the Commission-approved

Reliability Standards unnecessary or redundant requirements. We will not impose a

deadline on when these comments should be submitted, but ask that to the extent such

comments are submitted NERC, the Regional Entities, and interested entities coordinate

to submit their respective comments concurrently.

*North American Electric Reliability Corporation,* 138 FERC ¶ 61,193 at p 81 (March 15, 2012) (“P81”).

Consistent with P81, a draft Standards Authorization Request (SAR) was drafted to set forth criteria and a process to identify Reliability Standard requirements that either: (a) provide little protection to the Bulk Electric System; (b) are unnecessary or (c) are redundant; and, thereafter, to have NERC file the identified Reliability Standard requirements with FERC to have them removed from the FERC-approved list of Reliability Standards.

**Standards Process Input Group (SPIG)**

In addition to addressing P81, the draft SAR was drafted consistent with what the SPIG developed as Recommendation No. 4, as set forth in *NERC’s Recommendations to Improve The Standards Development Process* on page *12* (April 2012), which states:

**Recommendation 4: Standards Product Issues** — The NERC board is encouraged to require that the standards development process address: . . . The retirement of standards no longer needed to meet an adequate level of reliability.

**Collaborative Process**

The draft SAR and the suggested list of Reliability Standard requirements embedded in the SAR for consideration in the Initial Phase are the product of collaborative discussions among the following entities and their members: Edison Electric Institute, American Public Power Association, National Rural Electric Cooperative Association, Large Public Power Council, Electricity Consumers Resource Council, The Electric Power Supply Association, Transmission Access Policy Study Group, the North American Electric Reliability Corporation, and theRegional Entity Management Group.

It is hoped the time, effort and resources dedicated to the collaborative discussions have resulted in a reasonable SAR and an appropriately-scoped list of Reliability Standard requirements for the Initial Phase. It is also noted the statements accompanying each of the identified Reliability Standard requirements are the beginning of, and not necessarily a complete technical justification for, retirement of the requirements. It is also understood that the P81 Standards Drafting Team will need to coordinate discussions with other active Standard Drafting Teams concerning the retirement of certain Reliability Standard requirements.

To obtain input on the draft SAR, the P81 Standards Drafting Team is posting the draft SAR for stakeholder comment for a 30-day comment period. Accordingly, it is requested that you submit your comments by **September 4, 2012** via the[electronic comment form.](https://www.nerc.net/nercsurvey/Survey.aspx?s=5924c4614dd548a5998ee4c01d3a191e)

**Questions**

1. **Do you agree with the criteria listed in the SAR to identify Reliability Standard requirements for retirement?**

**If not, please explain in the comment area.**

Yes

No

Comments:

1. **The Initial Phase of the P81 project is designed to identify all FERC-approved Reliability Standard requirements that easily satisfy the criteria.** **Do you agree that the suggested list of Reliability Standard requirements included in the draft SAR easily satisfy the criteria listed in the draft SAR? If you disagree, please provide a statement supporting what Reliability Standard requirements you would add or subtract from the Initial Phase, including a citation to at least one element of Criterion B, as applicable.**

Yes

No

Comments:

1. **The subsequent phases of the P81 project are designed to identify all FERC-approved Reliability Standard requirements that could not be included in the Initial Phase due to the need for additional analysis or an editing of language. Please list any Reliability Standard requirements that you believe should be revised or retired in a subsequent phase, and include a brief supporting statement and citation to at least one element of Criterion B for each requirement listed.**

Comments:

1. **If you have any other comments or suggestions on the draft SAR that you have not already provided in response to the previous questions, please provide them here.**

Comments: