Unofficial Comment Form

Project 2018-03 Standards Efficiency Review Retirements

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **FAC-008-5 – Facility Ratings** by **8 p.m. Eastern, Wednesday, January 13, 2021.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](http://nercdotcomstage/pa/Stand/Pages/Project-2018-03-Standards-Efficiency-Review-Retirements.aspx). If you have questions, contact Standards Developer, Laura Anderson (via email), or at 404-446-9671.

## Background Information

In 2017, NERC initiated the Standards Efficiency Review (SER). The scope of this project was to use a risk-based approach to identify potential efficiencies through retirement of Reliability Standard Requirements. Following the completion of the first phase of work, the SER standard drafting team (SDT) submitted a SAR to the NERC Standards Committee, which the Standards Committee accepted in August 2018.

Project 2018-03 Standards Efficiency Review Retirements was initiated to consider and implement the recommendations for Reliability Standard retirements contained in the SAR.

Among other things, the SER SDT proposed retiring Requirements R7 and R8 in Reliability Standard FAC-008-3 as redundant and not needed for reliability. Proposed Reliability Standard FAC-008-4 passed final ballot at 95.74 percent on May 2, 2019; was adopted by the Board of Trustees on May 9, 2019; and was filed with the Federal Energy Regulatory Commission (FERC) on June 7, 2019 for approval.

On September 17, 2020, FERC issued Order No. 873. [[1]](#footnote-1) With respect to proposed Reliability Standard FAC-008-4, FERC determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that “… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated” (P 40). FERC remanded proposed Reliability Standard FAC-008-4 to NERC for further consideration.

The SER SDT has met, considered the issues contained in FERC’s Order No. 873, and has developed proposed Reliability Standard FAC-008-5, which would retain Requirement R8 and retire Requirement R7 of FAC-008-3.

## Questions

1. The SDT is proposing to retire Requirements R7 from FAC-008-3, as indicated in previously proposed FAC-008-4, and retain Requirement R8. Do you agree with the SDT’s proposal to retire Requirement R7? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT’s proposal, please provide your explanation.

[ ]  Yes

[ ]  No

Comments:

1. Please provide any additional comments for the SDT to consider that have not already been provided in the questions above.

Comments:

1. Order No. 873, *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards under the NERC Standards Efficiency Review*, 172 FERC ¶ 61,225 (2020), [https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20on%20SER%20Retirements.pdf](http://nercdotcomstage/FilingsOrders/us/FERCOrdersRules/Order%20on%20SER%20Retirements.pdf). [↑](#footnote-ref-1)