

December 28, 2017

VIA ELECTRONIC FILING

Ms. Katie Mitchell
Chief Clerk
New Brunswick Energy and Utilities Board
P.O. Box 5001
15 Market Square, Suite 1400
Saint John, NB
E2L 4Y9

Re: *North American Electric Reliability Corporation*

Dear Ms. Mitchell:

The North American Electric Reliability Corporation hereby submits North American Electric Reliability Corporation Informational Filing of Reliability Standards Development Plan 2018-2020. NERC requests, to the extent necessary, a waiver of any applicable filing requirements with respect to this filing.

Please contact the undersigned if you have any questions concerning this filing.

Respectfully submitted,

/s/ Shama Elstein

Shama Elstein
*Senior Counsel for the North American Electric
Reliability Corporation*

Enclosure

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**BEFORE THE
MINISTRY OF ENERGY
OF THE PROVINCE OF NEW BRUNSWICK**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
INFORMATIONAL FILING OF RELIABILITY STANDARDS DEVELOPMENT PLAN
2018-2020**

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December 28, 2017

TABLE OF CONTENTS

I. NOTICES AND COMMUNICATIONS..... 2

II. BACKGROUND 2

III. 2018 DEVELOPMENT PLAN..... 3

 A. Summary of 2018 Development Plan 3

 B. 2017 Progress Report 4

 C. Prioritization of 2018 Projects..... 5

IV. CONCLUSION..... 6

Attachment A *Reliability Standards Development Plan: 2018-2020*

**BEFORE THE
MINISTRY OF ENERGY
OF THE PROVINCE OF NEW BRUNSWICK**

**NORTH AMERICAN ELECTRIC)
RELIABILITY CORPORATION)**

**NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION
INFORMATIONAL FILING OF RELIABILITY STANDARDS DEVELOPMENT PLAN
2018-2020**

The North American Electric Reliability Corporation (“NERC”) hereby submits its 2018-2020 Reliability Standards Development Plan (“2018 Development Plan”) in accordance with Section 310 of the NERC *Rules of Procedure*.¹ The 2018 Development Plan, included herein as **Attachment A**, provides a status update on active development projects, a forecast of future work to be undertaken by industry participants and NERC throughout the upcoming year, and an analysis comparing completed projects and development accomplishments with the prior year’s Reliability Standards Development Plan. The NERC Board of Trustees (“NERC Board”) approved the 2018 Development Plan on November 9, 2017. NERC submits this filing and attached 2018 Development Plan for informational purposes only.

¹ Section 310 of NERC’s *Rules of Procedure* requires NERC to develop and provide an annual Reliability Standards Development Plan for development of Reliability Standards to the applicable governmental authorities. Under that Section, NERC is also required to consider comments and priorities of the applicable governmental authorities in any updates made to the plan, and the plan should compare current accomplishments with the prior plan. See NERC’s Rules of Procedure, accessible online at: <http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

I. NOTICES AND COMMUNICATIONS

Notices and communications regarding this filing may be addressed to the following:

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II. BACKGROUND

Pursuant to Section 310 of the NERC Rules of Procedure, NERC submitted an initial version of a plan for Reliability Standards development, entitled the *Reliability Standards Development Plan: 2007–2009*. NERC has since updated the plan annually, and the 2018-2020 version of the plan is presented in this filing. Consistent with previous versions, the 2018 Development Plan is filed for informational purposes and no specific action is requested at this time.

The 2018 Development Plan is intended to:

1. Serve as a management tool to guide and coordinate the development of Reliability Standards and provide benchmarks for assessing progress;
2. Serve as a communications tool for coordinating standards development work with applicable governmental agencies in the United States and Canada and for engaging stakeholders in Reliability Standards development activities; and
3. Provide a basis for developing annual plans and budgets for the NERC Reliability Standards Program.

As with each prior year's plan, NERC obtained stakeholder input on the 2018 Development Plan. As detailed in Section III, NERC submits this filing to summarize the 2018

Development Plan and inform the applicable governmental authorities and other interested parties of projects noted in the 2017 Development Plan that will continue into 2018.

III. 2018 DEVELOPMENT PLAN

A. Summary of 2018 Development Plan

The 2018 Development Plan identifies the current plans and priorities for development and modification of NERC Reliability Standards in the immediate three-year time horizon. The 2018 Development Plan builds upon the work of previous years in transforming the body of NERC Reliability Standards into a mature state. Most of the work in future years will focus on projects related to periodic reviews and the standards grading initiative. Additionally, NERC will initiate a Reliability Standards efficiency review. The purpose of this review is to assess the body of NERC Reliability Standards and determine whether NERC can realize efficiencies by retiring or modifying Reliability Standards or Requirements that are no longer necessary to protect reliability. This review will be conducted through an open and transparent process in which industry participation is encouraged. The results of NERC's standards grading initiative will help inform these reviews. A list of grades for standards graded in 2017 is included as Attachment 1 to the 2018 Development Plan.

NERC anticipates that the Reliability Standards development work outlined in the 2018 Development Plan will be dynamic and will be updated periodically as projects are completed or as new needs are identified and projects are considered. NERC also recognizes Reliability Standards development in 2018 may require flexibility in planning to ensure that activities are given appropriate resources and priority.

Projects to develop new or revised Reliability Standards may be initiated in response to applicable governmental authority directives or to address new or emerging risks. To identify

reliability risks, NERC will continue to seek input and recommendations from the Reliability Issues Steering Committee (“RISC”) and employ feedback from sources such as the Compliance Monitoring and Enforcement Program, RISC profiles, Events Analysis, Compliance violation statistics, published “Lessons Learned,” and any feedback from Regional Entity feedback mechanisms. NERC will use the information available to evaluate a reliability risk and determine whether a Reliability Standard project is the best means of addressing that risk.

B. 2017 Progress Report

The 2017 Development Plan identified nine (9) standard development projects that would be initiated in 2017 or continue from 2016. The projects and their current status are noted below.

Projects Completed in 2017

The following projects identified in the 2017 Development Plan were completed in 2017:

- Project 2013-03 Geomagnetic Disturbance Mitigation – TPL-007-2
- Project 2015-08 Emergency Operations – EOP-004, EOP-005, EOP-006, EOP-008
- Project 2016-01 Modifications to TOP and IRO Standards – TOP-001, IRO-002
- Project 2016-03 Cyber Security Supply Chain Risk Management – CIP-013-1
- Project 2016-EPR-01 Enhanced Periodic Review of Personnel Performance, Training, and Qualifications Standards – PER-001, PER-003, and PER-004
- Project 2016-EPR-02 Enhanced Periodic Review of Voltage and Reactive Standards – VAR-001 and VAR-002

The two interpretation projects noted in the 2017 Development Plan were also completed.

Project 2015-INT-03 Interpretation of TOP-002.2.1b, which was assigned a medium to low priority in the 2017 Development Plan, was terminated by the Standards Committee in March 2017. Project 2015-INT-01 Interpretation of CIP-002-5.1, which was assigned a medium to low priority in the 2017 Development Plan, concluded in late 2016.

Projects Continuing in 2018

The following standard development projects identified in the 2017 Development Plan will continue into 2018:

- Project 2015-09 Establish and Communicate System Operating Limits
- Project 2015-10 Single Points of Failure TPL-001
- Project 2016-02 Modifications to CIP Standards
- Project 2016-04 Modifications to PRC-025-1

Following the development of the 2017 Development Plan, NERC also initiated several projects to conduct periodic reviews or to modify standards in response to periodic review recommendations. These projects are identified and prioritized in the 2018 Development Plan, as described in the following section.

C. Prioritization of 2018 Projects

For each new Reliability Standard Project identified in the 2018 Development Plan, the NERC Standards Committee has assigned a priority of either high, medium, or low. These rankings are in addition to priority assignments made in previous plans for ongoing projects, and the assignments are based on the following criteria: (i) outstanding regulatory directives with filing deadlines (high priority); (ii) RISC category rankings of high impact with consideration of probability of occurrence (high or medium priority); (iii) potential reliability risks identified through feedback mechanisms (high, medium, or low priority, based on the risk); (iv) outstanding regulatory directives without regulatory deadlines, or regulatory considerations (high or medium priority); (v) outstanding requirements that are known candidates for retirement (medium or low priority); and (vi) any known adverse content and quality assessment (likely low priority). The new and continuing projects identified in the 2018 Development Plan and their assigned priority category are provided below.

High Priority

- Project 2016-02 Modifications to CIP Standards

Medium Priority

- Project 2015-09 Establish and Communicate System Operating Limits – FAC-010, FAC-011, FAC-014
- Project 2015-10 Single Points of Failure – TPL-001
- Project 2016-04 Modifications to PRC-025-1
- Project 2017-06 Modification to BAL-002-2

Low Priority

- Project 2017-01 Modifications to BAL-003-1.1
- Project 2017-02 Modifications to Personnel Performance, Training, and Qualifications Standards – PER-003 and PER-004
- Project 2017-03 FAC-008 Periodic Review
- Project 2017-04 Periodic Review of Interchange Scheduling and Coordination Standards – INT-004, INT-006, INT-009, and INT-010
- Project 2017-05 Periodic Review of NUC-001-3
- Project 2017-07 Standards Alignment with Registration

Additionally, at least two periodic review projects should commence in 2018 based on feedback from industry and results of the standards grading project, among other initiatives.

Other projects may be initiated in 2018 based on new standard authorization requests, emerging risks to the Bulk Power System, or new regulatory directives.

The industry-led Standards Committee has prioritized current and upcoming projects, as communicated through prioritization schedules and project plans, to ensure that development moves at a measurable and sustainable pace.

IV. CONCLUSION

As discussed above, the 2018 Development Plan was developed in accordance with Section 310 of the NERC Rules of Procedure and identifies the current plans and priorities for

development and modification of NERC Reliability Standards in the immediate three-year time horizon. NERC submits this filing and the attached 2018 Development Plan for informational purposes only.

Respectfully submitted,

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Date: December 28, 2017

ATTACHMENT A
RELIABILITY STANDARDS DEVELOPMENT PLAN
2018-2020

NERC

NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Reliability Standards Development Plan

2018-2020

October 18, 2017

RELIABILITY | ACCOUNTABILITY



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Table of Contents

Background.....	iii
Executive Summary	iv
2017 Progress Report	1
FERC Directives	1
Projects Completed in 2017.....	1
2018 Projects	2
Projects Continuing from 2017 into 2018.....	2
High Priority	2
Medium Priority	2
Low Priority	2
Projects Commencing in 2018	3
Standards Grading Metrics.....	4
Final Grades for Standards Graded in 2017	9

Background

The 2017–2019 Reliability Standards Development Plan (RSDP) continued progress toward NERC’s goal to develop a stable set of clear, concise, technically sound, and results-based NERC Reliability Standards and to retire requirements that do little to promote reliability. The 2017-2019 RSDP specifically highlighted the importance of the Integration of Variable Generation Task Force and Essential Reliability Services Working Group recommendations and called for continued communication with the Reliability Issues Steering Committee (RISC) on emerging risks. The 2017-2019 RSDP also indicated that most of the work in the next three years would focus on Periodic Reviews and recognized there may be new or emerging risks identified that would generate new standards development projects. The addition of the Standards Grading Metric in 2016 informs the Periodic Reviews as to the quality and content of the standards.¹

The 2017-2019 RSDP also recognized the importance of addressing subsequent directives from applicable regulatory authorities, including the Federal Energy Regulatory Commission (FERC), Standard Authorization Requests (SARs), and the value of enhanced communication through industry feedback loops. It also stressed that Periodic Reviews and standards development activities would occur at a measured pace, compared to the level of activity and pace of standards development during previous years, and that they would be aligned with strategic considerations of reviewing standard families that are interrelated.²

As described herein, the 2018-2020 RSDP builds upon the goals of the 2017-2019 RSDP with an additional objective of enhanced consideration of cost effectiveness in standards development.

Pursuant to Section 310 of the NERC Rules of Procedure, NERC is required to develop and provide to applicable governmental authorities an annual RSDP for Reliability Standards development. Each annual RSDP must include a progress report comparing results achieved to the prior year’s RSDP. NERC is required to consider the comments and priorities of the applicable governmental authorities in developing and updating the annual RSDP. NERC also provides the RSDP to the NERC Standards Committee (SC) for review and posts the RSDP for industry comment.

¹ The Periodic Review Standing Review Team will grade the standards. The team includes representatives from NERC, the Regional Entities, and the NERC technical committees. Grading occurs prior to conducting the Periodic Review.

² In some cases a narrower review of a standard will likely be appropriate. For example, there are not necessarily other interrelated standards with FAC-003.

Executive Summary

The 2018–2020 RSDP recognizes the diligent work of the last few years in transforming the body of NERC Reliability Standards into a mature state while shifting its focus to Periodic Reviews, FERC directives, emerging risks, SARs, and the standards grading initiative. The 2018-2020 RSDP also contemplates that the work of the various NERC technical committees and working groups thereunder may result in one or more SARs and subsequent standards projects.

As with the 2017-2019 RSDP, Periodic Reviews will occur at a measured pace compared to the level of activity and pace of standards development during recent years. Additionally, Periodic Reviews will be aligned with strategic considerations of reviewing standard families that are interrelated. The Standards Grading Metric and “Final Grades for Standards Graded in 2017” (Attachment 1) help to inform the Periodic Reviews as to the quality and content of the standards.³

The 2018-2020 RSDP also includes plans for completing the Periodic Reviews initiated in 2016 and 2017, and for commencing additional Periodic Reviews in 2018.

While most of the work in the next three years will focus on Periodic Reviews, there may be new or emerging risks identified that would generate new standards development projects. NERC will continue to seek input and recommendations from the RISC with regard to emerging or potential risks to Bulk Electric System (BES) reliability that may require revisions to existing standards or new standards development. To help determine impact of potential risk to BES reliability, NERC will use various feedback mechanisms, including but not limited to, feedback from the Compliance Monitoring and Enforcement Program, RISC profiles, Events Analysis, and Compliance violation statistics, as well as any published “Lessons Learned.” The Regional Entities also have feedback mechanisms in place to solicit comments from industry and to help identify approaches to meet concerns and provide input to the standards. Standards input will continue to be coordinated with the North American Energy Standards Board as appropriate.

In assessing feedback to create new or revised standards, NERC will focus on risk, reliability or security data, and enforcement information to determine whether a standard revision is the best tool to initially address the reliability risk. Periodic reviews and initiatives such as the streamlining NERC Reliability Standards project also enable NERC to identify requirements that do little to promote reliability and should therefore be retired.

NERC is committed to enhancing and refining cost effectiveness considerations in the standards development process during the 2018-2020 period. For example, during 2016 and 2017, NERC conducted two cost effectiveness pilots.⁴ NERC continues to develop and implement its cost effectiveness process, which has been implemented more broadly in standards development and will continue to evolve during this work plan period. Cost effectiveness questions are also part of the Periodic Reviews and SAR process. NERC will continue to look for ways to enhance or refine the review and implementation of cost effectiveness during the standards development process in a way that is productive and does not unduly burden the industry for data and input.

This 2018-2020 RSDP provides insight into standards development activities anticipated at the time of publication, so that stakeholders may make available appropriate resources to accomplish these standards development objectives. Additional activities such as Requests for Interpretation and Regional Variance development may

³ The Periodic Review standing review team grades the standards prior to conducting Periodic Reviews. The team includes representatives from NERC, the Regions, and NERC technical committees. If there is a recommended change in the standard due to Periodic Review recommendations and subject to the standards development process, the Periodic Review standing review team will re-grade the standard with the revised language.

⁴ Information on NERC’s cost effectiveness initiative can be found at: <http://www.nerc.com/pa/Stand/Pages/CostEffectivenessPilot.aspx>.

impact the plan. In order to help the industry understand resource requirements for each project, the RSDP now shows time frames and anticipated resources for each project under development.

2017 Progress Report

Pursuant to Section 310 of the NERC Rules of Procedure, NERC offers the following progress report on Reliability Standards development in 2017.

FERC Directives

As of June 30, 2017, there are 29 outstanding FERC directives, 13 of which are related to standards and being resolved through standards development activities. Additionally, FERC has issued directives pertaining to issues outside of NERC standards. These additional directives are being addressed by the NERC technical committees and other NERC departments (e.g., topics related to reliability assessment, performance analysis, etc.), which are not reflected in this total.

Projects Completed in 2017

The 2017–2019 RSDP identified nine projects initiated in 2017 or continued from 2016. All of the projects listed therein were either completed in 2016 or are planned to be completed in 2017 except for Project 2015-09 Establish and Communicate System Operating Limits, Project 2015-10 Single Points of Failure, Project 2016-02 Modifications to CIP Standards, and Project 2016-04 Modifications to PRC-025-1. Additional project information is available on the NERC website on the Standards web page.⁵

The following projects have been or are planned to be completed in 2017 (actual and anticipated NERC Board of Trustees (Board) adoption dates are noted):

Projects from the 2017-2019 RSDP

1. Project 2013-03 Geomagnetic Disturbance Mitigation - TPL-007-2 (Board adoption anticipated in November 2017)
2. Project 2015-08 Emergency Operations – EOP-004, EOP-005, EOP-006, EOP-008 (adopted by the Board in February 2017)
3. Project 2016-01 Modifications to TOP and IRO Standards – TOP-001, IRO-002 (adopted by the Board in February 2017)
4. Project 2016-03 Cyber Security Supply Chain Risk Management – CIP-013-1 (Board adoption expected in August 2017)
5. Project 2016-EPR-01 Enhanced Periodic Review of Personnel Performance, Training, and Qualifications Standards - PER-001, PER-003, and PER-004 (SAR submitted to the Standards Committee in October 2017)
6. Project 2016-EPR-02 Enhanced Periodic Review of Voltage and Reactive Standards - VAR-001 and VAR-002 (reaffirmed by the Board in August 2017)

⁵ As of the date of publication, the subject web page resides at <http://www.nerc.com/pa/Stand/Pages/default.aspx>.

2018 Projects

Projects Continuing from 2017 into 2018

In determining high, medium, or low priority to designate projects as listed in this RSDP, the following factors were taken into consideration:

1. Outstanding regulatory directives with filing deadlines (High Priority)
2. RISC category rankings of high impact with consideration of probability of occurrence (High or Medium Priority)
3. Potential reliability risk from stakeholders provided through feedback mechanisms (High, Medium, or Low Priority, based on the risk)
4. Outstanding regulatory directives without regulatory deadlines or “soft directives” such as considerations (High or Medium Priority)
5. Outstanding requirements that are known candidates for retirement (Medium or Low Priority)
6. Any known adverse content and quality assessments (likely Low Priority, as any reliability gaps identified have already been addressed)

High Priority

- Project 2016-02 Modifications to CIP Standards (drafting estimated to be completed by May 1, 2018 requiring approximately 10 industry subject matter experts for approximately 75 work hours each for the remaining part of this project)

Medium Priority

- Project 2015-09 Establish and Communicate System Operating Limits- FAC-010, FAC-011, FAC-014 (drafting estimated to be completed by April 1, 2018 requiring approximately 10 industry subject matter experts for approximately 100 work hours each for the remaining part of this project)
- Project 2015-10 Single Points of Failure - TPL-001 (drafting estimated to be completed by April 1, 2018 requiring approximately 10 industry subject matter experts for approximately 60 work hours each for the remaining part of this project)
- Project 2016-04 Modifications to PRC-025-1 (drafting estimated to be completed by April 1, 2018 requiring approximately 6 industry subject matter experts for approximately 60 work hours each for the remaining part of this project)
- Project 2017-06 Modification to BAL-002-2 (drafting estimated to be completed by November 2018 requiring approximately 8 subject matter experts for approximately 40 work hours each for this project)

Low Priority

- Project 2017-01 Modifications to the BAL-003-1.1 (drafting estimated to be completed by November 2018 requiring approximately 8 subject matter experts for approximately 80 work hours each for this project)
- Project 2017-02 Modifications to Personnel Performance, Training, and Qualifications Standards - PER-003, and PER-004 (drafting estimated to be completed by May 2018 requiring approximately 10 industry subject matter experts for approximately 40 work hours each for this project)

- Project 2017-03 FAC-008 Periodic Review (drafting estimated to be completed by August 1, 2018 requiring approximately 10 industry subject matter experts for approximately 100 work hours each for the remaining part of this project)
- Project 2017-04 Periodic Review of Interchange Scheduling and Coordination Standards - INT-004, INT-006, INT-009 and INT-010 (drafting estimated to be completed by August 1, 2018 requiring approximately 10 industry subject matter experts for approximately 80 work hours each for the remaining part of this project)
- Project 2017-05 Periodic Review of NUC-001-3 (drafting estimated to be completed by May 1, 2018 requiring approximately eight industry subject matter experts for approximately 60 work hours each for the remaining part of this project)
- Project 2017-07 Standards Alignment with Registration (drafting estimated to be completed by August 2018 requiring approximately 10 industry subject matter experts for approximately 60 work hours each for the remaining part of this project)

Projects Commencing in 2018

At least two Periodic Reviews should commence in 2018 based on feedback from industry and results of the Standards Grading project and other initiatives. Additionally, SARs, emerging risks to the Bulk-Power System, and FERC regulatory directives that may occur subsequent to publishing this RSDP may prompt additional projects in 2018.

NERC Reliability Standards Efficiency Review

As part of its continuing focus on supporting the success and evolution of NERC Reliability Standards to ensure they appropriately address risks to the Bulk-Power System, NERC is interested in assessing where it may be able to realize efficiencies in particular Reliability Standards or requirements through retirement or modifications to requirements or standards that may no longer be necessary. Beginning in the third quarter of 2017, NERC will begin using internal ERO Enterprise resources, potentially augmented with external expert resources, to evaluate an initial potential scope of an effort to evaluate candidates for such review. Based on that initial review, NERC will solicit industry participants to evaluate possible candidate requirements that may no longer be necessary to support reliability or address current risks to the Bulk-Power System. Through open and transparent industry participation, this list will be formed and vetted with industry in similar fashion as prior efforts to retire requirements that were administrative in nature (e.g., the “Paragraph 81” effort). Lessons from both the “Paragraph 81” effort and the Independent Expert Review Panel underscore the importance of moving forward through open discussion and open solicitation for participants. NERC will also coordinate with the industry team to ensure all of the information developed through the 2016 and 2017 Standards Grading efforts, which includes consideration of content, quality, cost, and reliability impact analysis.

Standards Grading Metrics

The NERC SC endorsed a grading system for standards as a metric on March 9, 2016. The grading is conducted by the Periodic Review Standing Review Team (PRSRT) as set forth in the Periodic Review process. The PRSRT is comprised of the following:

- SRT chair: SC chair or (or SC chair delegate)
- Operating Committee (OC) chair (or OC chair delegate)
- Planning Committee (PC) chair (or PC chair delegate)
- NERC staff
- Representation from the Regional Entities

The grading metrics include possible scores of 0-3 for quality and 0-13 for content. The set of standards chosen each year for grading, according to the criteria in the above section, will be reviewed and its grading will be used to prioritize and determine the sequence they should enter into the Periodic Review process. At least one industry comment period will take place to allow industry to comment on the grading performed by the PRSRT. The grades, based on the PRSRT and any industry input, will be finalized, appended to the RSDP, and used to complete the prioritization each year.

Attachment 1

Final Grades for Standards Graded in 2017

The Enhanced Periodic Review (EPR) Standing Review Team (SRT) was tasked with using metrics from the 2013 Independent Experts Review Panel to assign numeric grades to instruct future EPR teams. While the SRT’s final standards grades are important data points for the EPRs to consider, they are intended as one of many inputs to facilitate discussion during the reviews. Detailed analysis and background information on the Standards Grading process and SRT recommendations for periodic review project prioritization based on 2017 grades are posted on the [project page](#).

Standard & Requirement	Content Average	Quality Average
BAL-003-1.1 R1.	2.75	13
BAL-003-1.1 R2.	3.00	13
BAL-003-1.1 R3.	2.75	13
BAL-003-1.1 R4.	2.75	13
COM-001-2.1 R1	2.75	12.5
COM-001-2.1 R2	2.75	12.75
COM-001-2.1 R3	3.00	13
COM-001-2.1 R4	3.00	13
COM-001-2.1 R5	3.00	13
COM-001-2.1 R6	3.00	13
COM-001-2.1 R7	3.00	13
COM-001-2.1 R8	3.00	13
COM-001-2.1 R9	3.00	12.5
COM-001-2.1 R10	3.00	12.75
COM-001-2.1 R11	2.75	12.25
COM-002-4 R1	2.75	12.5
COM-002-4 R3	3.00	13
COM-002-4 R4	3.00	12.75
COM-002-4 R5	3.00	12.5
COM-002-4 R6	3.00	12.5
COM-002-4 R7	3.00	12.5
FAC-001-2 R1	2.75	12.25
FAC-001-2 R2	3.00	12.25
FAC-001-2 R3	3.00	12
FAC-001-2 R4	3.00	11.75
FAC-002-2 R1	2.75	12.75
FAC-002-2 R2	2.75	12.75
FAC-002-2 R3	2.50	12.75
FAC-002-2 R4	2.75	12.75
FAC-002-2 R5	2.75	12.75
IRO-009-2 R1	3.00	12.75
IRO-009-2 R2	3.00	12.75

Standard & Requirement	Content Average	Quality Average
IRO-009-2 R3	3.00	12.75
IRO-009-2 R4	3.00	12.75
MOD-032-1 R1	2.00	12.5
MOD-032-1 R2	2.25	13
MOD-032-1 R3	2.25	13
MOD-032-1 R4	2.75	12.75
TPL-001-4 R1	3.00	12.75
TPL-001-4 R2	2.75	12.25
TPL-001-4 R3	2.75	11.75
TPL-001-4 R4	2.75	12
TPL-001-4 R5	3.00	12.5
TPL-001-4 R6	3.00	12.5
TPL-001-4 R7	3.00	12.25
TPL-001-4 R8	2.75	12.5