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=91eceef6da8043879e253bc5961c621e) located at the link below to submit official comments on the P81 Project. Comments must be submitted by **December 10, 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 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 a suggested list of Reliability Standard requirements embedded in the SAR for consideration in the Initial Phase was 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. The draft SAR was posted for comment, which were due September 4, 2012. The P81 Standards Drafting Team reviewed the comments and finalized the SAR and the proposed list of Reliability Standard requirements for retirement.

**Proposed List**

A list of Reliability Standard requirements proposed for retirement is posted along with a technical white paper that sets forth the technical justifications for each requirement. To obtain input on the list of Reliability Standard requirements proposed for retirement and the technical white paper, each are posted for a 45-day comment period. Accordingly, it is requested that you submit your comments by **December 10, 2012** via the[electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=91eceef6da8043879e253bc5961c621e).

**Questions**

1. **If retired, do any Reliability Standard requirements proposed for retirement create a gap in reliability?**

**If yes, please explain in the comment area.**

Yes

No

Comments:

1. **Do you have any comments on the technical white paper?**

Yes

No

Comments: