December 14, 2016

North American Electric Reliability Corporation
1325 G Street N.W., Suite 600
Washington, D.C. 20005

Attention: Lauren A. Perotti
Counsel for North American Electric Reliability Corporation

Reference: Revisions to the Violation Risk Factors for Reliability Standards IRO-018-1 and TOP-010-1, Docket No. RD16-6-001.

Dear Ms. Perotti:

On September 22, 2016, in Docket No. RD16-6-000,1 the Commission approved Reliability Standards IRO-018-1 (Reliability Coordinator Real-time Reliability Monitoring and Analysis Capabilities) and TOP-010-1 (Real-time Reliability Monitoring and Analysis Capabilities) and associated implementation plan, Violation Severity Levels, and several of the proposed Violation Risk Factors (VRF). The Commission also directed NERC to submit a compliance filing within 60 days of issuance of the September 22 Order revising the VRF designations for Requirement R1 in Reliability Standard IRO-018-1 and Requirements R1 and R2 in Reliability Standard TOP-010-1 from “medium” to “high”.

On November 2, 2016, NERC filed for Commission approval the revised VRF designations, consistent with the Commission’s directive in the September 22 Order.

NERC’s filing was noticed on November 7, 2016, with interventions, comments and protests due on or before December 7, 2016. No interventions, comments or protests were received.

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1 North American Electric Reliability Corp., 156 FERC ¶ 61,207 (2016) (‘‘September 22 Order’’).
NERC’s uncontested petition is hereby approved pursuant to the relevant authority delegated to the Director, Office of Electric Reliability under 18 C.F.R. § 375.303 (2016), effective as of the date of this order.

This action shall not be construed as approving any other application, including proposed revisions of Electric Reliability Organization or Regional Entity rules or procedures pursuant to 18 C.F.R. § 375.303(a)(2)(i). Such action shall not be deemed as recognition of any claimed right or obligation associated therewith and such action is without prejudice to any findings or orders that have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against the Electric Reliability Organization or any Regional Entity.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713 (2016).

Sincerely,

Michael Bardee, Director
Office of Electric Reliability