

March 18, 2014

Ms. Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, D.C. 20426

Re: Request for Extension of Time to File Revisions to the Violation Risk Factors Assigned to Reliability Standards CIP-006-5, Requirement R3 and CIP-004-5, Requirement R4  
Docket No. RM13-5-000

Dear Secretary Bose:

The North American Electric Reliability Corporation (“NERC”) hereby requests a 10-day extension of time to file revisions to the Violation Risk Factors (“VRFs”) assigned to Reliability Standards CIP-006-5, Requirement R3 and CIP-004-5, Requirement R4, in accordance with the Federal Energy Regulatory Commission’s (“Commission’s”) directive in Order No. 791.<sup>1</sup> In Order No. 791, FERC approved new and modified Critical Infrastructure Protection (“CIP”) Reliability Standards, referred to as the CIP Version 5 Standards. Among other things, FERC directed NERC to file revisions to the VRFs assigned to Reliability Standards CIP-006-5, Requirement R3 and CIP-004-5, Requirement R4, within 90 days of the effective date of Order No. 791.

Order No. 791 became effective on February 3, 2014, which requires NERC to submit the revised VRF assignments by May 5, 2014.<sup>2</sup> In accordance with its Rules of Procedure, NERC must obtain approval from its Board of Directors prior to revising a VRF assignment and filing the revised VRF for Commission approval. The next meeting of the NERC Board of Trustees is scheduled for May 7, 2014. Accordingly, NERC respectfully requests a 10-day extension of time, until May 15, 2014, to file the VRF revisions to Reliability Standards CIP-006-5, Requirement R3 and CIP-004-5, Requirement R4 so as to allow the NERC Board of Trustees to approve the proposed VRF revisions at its regularly scheduled meeting on May 7, 2014.

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<sup>1</sup> *Version 5 Critical Infrastructure Protection Reliability Standards*, Order No. 791, 145 FERC ¶ 61,160 at PP 184, 196 (2013).

<sup>2</sup> May 4, 2014, which is 90 days from February 3, 2014, is a Sunday. Accordingly, the filing deadline becomes the next business day.

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Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/S. Shamai Elstein

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 18th day of March, 2014.

/s/ Courtney Baughan  
Courtney Baughan

Legal Assistant for North American Electric  
Reliability Corporation