

Standards Announcement

Project 2013-02 Paragraph 81

Informal Comment Period Now Open: August 3 – September 4, 2012

Now Available

The Standards Committee has authorized posting of this draft Standards Authorization Request (SAR) for stakeholder input for 30 days.

Instructions

An informal comment period is open through 8 p.m. Eastern on **Monday, September 4, 2012**. Please use this [electronic form](#) to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at monica.benson@nerc.net. An off-line, unofficial copy of the comment form is posted on the [project page](#).

Next Steps

A webinar on the draft SAR will be conducted on August 21, 2012 from 2-3 p.m. Eastern and will be announced in a separate email with the registration link.

The drafting team will review the comments and determine whether to revise the SAR before proceeding with Phase 1 of the project. The drafting team will post a summary of its responses to comments received during this informal comment period.

Background

On March 15, 2012, the Federal Energy Regulatory Commission (FERC) issued an order on NERC's Find, Fix and Track process that stated the following in Paragraph 81:

"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.”

The purpose of the project is to retire or modify FERC-approved Reliability Standard requirements that as FERC noted, “provide little protection to the reliable operations of the BES,” are redundant or unnecessary, or to retire or modify a FERC-approved Reliability Standard requirement to increase the efficiency of the ERO’s compliance programs. The draft SAR identifies criteria for retiring or modifying requirements, defines phases for the project, and includes a suggested list of requirements put together by NERC, the regions, and the trades and their member companies for consideration in Phase 1. The suggested list includes requirements in 28 Reliability Standards. Phase 1 identifies Reliability Standard requirements that clearly meet the criteria set forth in the SAR and are believed to not require extensive technical research. Subsequent phases of the project will address Reliability Standard requirements that need additional technical research before retirement or modification.

To sign up for the plus list for this project to follow along with meetings and work products, please email [Kristin Iwanechko](#).

Standards Development Process

The [Standards Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

*For more information or assistance, please contact Monica Benson,
Standards Process Administrator, at monica.benson@nerc.net or at 404-446-2560.*

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