

## Standards Announcement

### Project 2013-02 Paragraph 81

**Formal Comment Period Now Open: October 25 – December 10, 2012**

**Ballot Pool Forming Now: October 25 – November 23, 2012**

Upcoming

Initial Ballot: November 30 – December 10, 2012

#### Now Available

The Paragraph 81 (P81) standard drafting team (SDT) has posted a single PDF containing redlined versions of 27 standards showing 38 requirements proposed to be retired, and an implementation plan for a formal comment period and initial ballot that will end at 8 p.m. Eastern on Monday, December 10, 2012. A ballot pool is being formed and the ballot pool window is open through 8 a.m. Eastern on **Friday, November 23, 2012** (*please note that ballot pools close at 8 a.m. Eastern and mark your calendar accordingly*).

The following documents are posted on the project page for review and balloting:

- **Redline of Standards with Proposed Retirements** – A PDF document containing a redline of each of the affected standards, indicating the requirements and associated elements proposed to be retired with a “(Retired)” and with the version number remaining the same. When these Requirements are retired, the version numbers of the standards will NOT be incremented. After evaluating the options and consulting with the Standards Committee and Standards Committee Process Subcommittee, the P81 drafting team determined that this was the most practical approach. Incrementing the version numbers of each standard is impractical because, in some cases, a subsequent version has already been developed. In addition, incrementing the version would require renumbering Requirements where a retired Requirement created a gap in numbering, and this creates an undesirable administrative burden for entities using certain systems to manage their compliance programs.
- **Implementation Plan** – The implementation plan for retiring the Phase I requirements.

The following documents are posted on the project page as Supporting Materials to assist stakeholders in their review:

- **Final SAR (clean and redline)** – The final SAR incorporates revisions to the draft SAR by the P81 SDT in response to comments received from the industry.
- **Technical White Paper** – The technical white paper includes the technical justification developed by the P81 SDT to support the retirement of the proposed requirements in Phase I.

- **Redline of VSL Matrix** – This identifies the VSLs (and parts of VSLs) that will be retired when the requirements in Phase I are retired. The matrix may be useful in providing a complete view of the VSLs and parts of VSLs that will be retired when a particular Requirement is retired, since some of the early standards have not had the FERC-approved VSLs incorporated in the standard.
- **Spreadsheet with Proposed Retirements** – This spreadsheet includes a list of the requirements proposed in the draft SAR and their status in the final SAR (kept in final SAR for retirement, kept in final SAR for information only, deferred to subsequent phase). Additionally, the spreadsheet includes requirements that were added to the Phase I list as a result of industry comments on the draft SAR, which are identified as ‘added to final SAR for retirement.’
- **Unofficial Comment Form (Word)** – A Word version of the comment form for the development of internal draft responses only (the final must be submitted electronically).

### **Instructions for Joining Ballot Pool(s)**

Registered Ballot Body members must join the ballot pool to be eligible to vote in balloting of the requirements being proposed for retirement. A single ballot pool is being formed, and all of the standards with Requirements being proposed for retirement will be balloted as a group. Registered Ballot Body members may join the ballot pool at the following page: [Join Ballot Pool](#)

During the pre-ballot window, members of the ballot pool may communicate with one another by using the “ballot pool list server.” (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list server.) The ballot pool list server for this ballot pool is: [bp-2013-02\\_P81\\_in@nerc.com](mailto:bp-2013-02_P81_in@nerc.com).

The ballot pool is open **through 8 a.m. Eastern on Friday, November 23, 2012.**

### **Instructions for Commenting**

A formal comment period is open through 8 p.m. Eastern on **Monday, December 10, 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](mailto:monica.benson@nerc.net). An off-line, unofficial copy of the comment form is posted on the [project page](#).

### **Next Steps**

A single ballot for all of the standards with Requirements being proposed for retirements will be conducted Friday, November 30, 2012 through 8 p.m. Monday December 10, 2012.

## 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 P81:

“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, which included criteria for retiring or modifying requirements, defined phases for the project, and a suggested list of requirements put together by NERC, the regions, and the trades and their member companies for consideration in Phase I, was posted for an informal comment period. In September, the P81 SDT met to respond to the comments received and finalize the SAR. The revisions resulted in a list of 38 requirements in 23 Reliability Standard versions being proposed for retirement and an additional 13 requirements included for informational purposes only. The P81 SDT also developed a Technical White Paper which includes the justification for retiring the proposed requirements.

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

## 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 Wendy Muller,  
Standards Development Administrator, at [wendy.muller@nerc.net](mailto:wendy.muller@nerc.net) or at 404-446-2560.*

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