

Individual or group. (32 Responses)

Name (19 Responses)

Organization (19 Responses)

Group Name (13 Responses)

Lead Contact (13 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (1 Responses)

Comments (32 Responses)

Question 1 (30 Responses)

Question 1 Comments (31 Responses)

Question 2 (31 Responses)

Question 2 Comments (31 Responses)

Group
Arizona Public Service Company
Jana Van Ness, Director of Regulatory Compliance
No
No
Individual
Thomas C. Duffy
Central Hudson Gas & Electric Corporation
No
Yes
CHG&E believes the reason for retiring CIP-003-3,-4 R3 and its sub-requirements is fallacious. The reason provided in the technical white paper is essentially: " First, and most importantly, that requirement has never been available for use to exempt an entity from compliance with any requirement of any NERC reliability standard. It only applies to exceptions to internal corporate policy, and only in cases where the policy exceeds a NERC standard requirement, or addresses an issue that is not covered in a NERC reliability standard. For example, if an internal corporate policy statement requires that all passwords be a minimum of 8 characters in length, and be changed every 30 days, this provision could be used for internal governance purposes to lessen the corporate requirement, back to the password requirements in CIP-007 R5.3, or in conjunction with a TFE to something else. The removal of this requirement has no effect on the TFE process, or compliance with any other NERC reliability standard requirement." CHG&E wishes to highlight the fact that NERC has no jurisdiction to impose or grant exceptions to internal corporate policies. Therefore, this requirement (and its sub - requirements) can only have been crafted to address exceptions to the NERC CIP requirements. Throughout this standard, the NERC requirements for a 'cyber security policy' are delineated. This requirement specifically addresses exceptions to the 'cyber security policy'. As written, this requirement can only be interpreted to mean that an exception to the NERC CIP required 'cyber security policy' is acceptable if properly documented and approved by the CIP Senior Manager. Central Hudson Gas & Electric Corporation strongly disagrees with the inclusion of CIP-003-3, -4 Requirements R3, R3.1, R3.2, R3.3 as candidates for retirement. The reasons stated in the SAR in favor of inclusion are that these requirements are administrative in nature and are purely examples of a documentation process. Further it is stated in the SAR that they, "... have been subject to misinterpretation, including responsible entities believing they can exempt themselves from compliance with the CIP requirements." This last statement is precisely the reason why the aforementioned requirements were included in the standard. These requirements allow Registered Entities to, on rare occasions, take an exception to one or several of the CIP requirements (for a

limited period of time) if they (1) have valid cause (major emergency, Force Majeure, etc.), (2) document the occurrence and (3) are reviewed and approved by the CIP Senior Manager. This process supports the Registered Entity's compliance effort and acknowledges the need for special protocols to address emergency circumstances. Without such a process, the only recourse for the Registered Entity is to self-report a violation which is not within their control. In other words, retirement of these requirements would force the Registered Entity to be in full compliance with ALL CIP Standards ALL the time regardless of circumstance. The concept of realistic expectations was undoubtedly the reason these requirements were crafted and included in the standard. Further, with regard to the Registered Entity's decision to claim an exception, a system of checks and balances already exists. At the time of a compliance audit of the standard's requirements, the Regional Entity reviews and makes a determination as to whether the actions taken by the Registered Entity were warranted. Further, the fact that this requirement is included in the FFT process is of little consolation since any exception would still constitute a violation of the NERC Standard on the part of the Registered Entity and would carry with that violation the associated stakeholder liability.

Individual

David Ramkalawan

Ontario Power Generation

No

The technical white paper has provided reasonable and well thought-out justifications for the retirement proposal to those reliability standard requirements.

No

Individual

John Bee

Exelon

Exelon agrees with EEIs position and comments submitted related to this project.

Yes

Exelon believes that if a company takes an exception it should be documented and proposes the following revision to R3: R3. Exceptions — Instances where the Responsible Entity cannot conform to its cyber security policy must be documented and authorized by the senior manager or delegate(s). R3.1. Exceptions to the Responsible Entity's cyber security policy must be documented. R3.2. Documented exceptions to the cyber security policy must include an explanation as to why the exception is necessary and any compensating measures.

No

Group

Northeast Power Coordinating Council

Guy Zito

No

No

Individual

Andrew Gallo

City of Austin dba Austin Energy

No

Please note: CIP-001-2a EA4 should be retired at the same time as CIP-001-2a R4 for the same reasons. We agree with the SDT regarding requirements applicable to the GO/GOP.

Yes

Please note: CIP-001-2a EA4 should be retired at the same time as CIP-001-2a R4 for the same reasons. We agree with the SDT regarding requirements applicable to the GO/GOP.

Group

Imperial Irrigation District (IID)

Jesus Sammy Alcaraz

No

No

Individual

Andrew Z. Pusztai

American Transmission Company

No

No

Group

Duke Energy

Greg Rowland

No

Yes

While we agree with retiring all of the Reliability Standard requirements proposed for retirement, we believe the P81 Project Technical White Paper should be more forceful in justifying retirement of the CIP requirements. Specifically, the "not an important part of a scheme of CIP Requirements" phrase is often used in Criteria C sections discussing VFR and AML issues. It would seem that FERC may have difficulty giving this phrase credibility since (i) the industry previously had balloted to approve such requirements, (ii) NERC BOT approved such requirements, and (iii) FERC approved such requirements. All of these approvals seem to indicate that all such entities previously believed that the requirements were important to the CIP scheme. Instead, we suggest that this phrase be replaced in each instance with phrases like the following: "As explained above and since the inception of this requirement, this requirement has not been shown to constitute a [key][integral] part of a scheme of CIP requirements."

Individual

Nazra Gladu

Manitoba Hydro

No

Standard revision numbers and Requirement sequence changes should be made at a later date, as future revisions are required to each Standard that contains any retired Requirements. This will relieve the undesirable administrative burden, while reflecting accurate revision numbers and Requirement sequences, as changes are required to the Standards.

Yes

CIP-003-3,-4 R1.2: Technical Justification (page 19): CIP personnel should act based on their cyber security policy; a policy which must address the CIP-002 through CIP-009 standards as required by CIP-003 R1.1. As a result, the specific training processes and procedures will reflect the cyber security policy. We suggest "they will act via their specific training, processes and procedures which reflect the overarching cyber security policy." CIP-007-3, -4 R7.3: (1) Technical Justification (page 32): For

added clarity, we suggest the wording "... small number of Reliability Standard requirements explicitly mandating ...". (2) Data and information collection for ERO compliance monitoring purposes is certainly within the context of the Reliability Standards. For added clarity, we suggest the wording "... for ERO compliance monitoring purposes without specific data collection language in the Reliability Standards." (3) It is unclear who "the entities" are. Should this state "Responsible Entities"? (4) For additional clarity, we suggest the wording "... the Reliability Standards are arguably more difficult to understand ...".

Individual

David Jendras

Ameren

No

No

Individual

Patrick Brown

Essential Power, LLC

No

No

Individual

David Thorne

Pepco Holdings Inc.

No

Yes

As part of this effort, a new revision number for any standard that is changed should be used. Also any measurements or registered entities (e.g. RRO) that would no longer apply should be deleted.

Group

Bonneville Power Administration

Jamison Dye

No

Yes

BPA appreciates the drafting team's decision to include TOP-001-1 R3 in the technical white paper for informational purposes rather than proposing to retire it.

Group

Dominion Resource Services

Randall Heise

No

No

Individual

Thad Ness
American Electric Power
No
AEP is not aware of any reliability gaps that would occur as a result of retiring the proposed Reliability Standards requirements.
No
Individual
Michelle D'Antuono
Occidental Energy Ventures Corp.
No
Occidental Energy Ventures Corp ("OEVC"). believes that the retirement of the Phase I requirements will pose little, if any, risk to the BES. However, in our view, this is a good start to a much more extensive restructuring of the regulatory model. Of course, the industry will need to gauge FERC's response to the initial grouping of requirements, but we should be prepared to aggressively push down this path.
Yes
OEVC believes the drafting team did an excellent job researching and defending each proposed retirement. In our view, this is a fundamental necessity as we must assume that FERC will closely scrutinize each one. However, we anticipate that some form of cost/benefit analysis will be requested in each case – particularly since the entire impetus behind the Paragraph 81 project is the shortage of compliance resources. It may be a worthwhile exercise to develop a cost model that accounts for industry and CEA resources accurately and effectively. The results must be weighed against the expected benefit of any requirement – as the industry and regulatory bodies clearly have some important trade-offs to consider. In particular, with FERC's recent emphasis on cyber security, cold weather preparation, and geomagnetic protection, some of the less effective requirements need to be removed. OEVC believes that the Commission will be reluctant to proceed in this manner without data that demonstrates the comparative benefit of each requirement.
Individual
Patricia Metro
National Rural Electric Cooperative Association (NRECA)
No
Yes
NRECA is very supportive of the recent ERO, Regional Entities and industry stakeholder efforts in response to the opportunity provided by FERC in P81 of the Find, Fix, Track and Report Order to review and eliminate standard requirements that provide no or minimal reliability benefits. NRECA is disappointed with the small number of requirements that are proposed for retirement in this initial phase of work, but will support this effort as it moves through the NERC standards development process and will continue participating in future phases of work related to the P81 project. It is our goal to ensure future phases of this effort lead to retirement of a much greater number of requirements that are not necessary for the reliability of the Bulk Electric System. NRECA has reviewed the P81 Technical White Paper. It appears that there are many more requirements, in addition to the 38 identified, that meet the criteria for deletion most of which were included in the SAR for this project. Although the phase approach to this project was explained and many of the requirements included in the SAR will be addressed in a subsequent phases of the project, there is a concern that the future phases of the project will not be completed in a timely manner since there is no timeline provided for the future phases in the Implementation Plan for this project. Having such a time-line will demonstrate to the FERC that the industry and the ERO are dedicated to eliminating standard requirements that provide no or minimal reliability benefits. NRECA is concerned that drafting teams are drafting requirements that would meet the criteria for deletion stated in this

Technical White Paper. There must be a mechanism in place to ensure "P81-qualified" requirements are not included in standards that are under development or in standards that are provided to the NERC BOT for approval. In addition, if requirements are retired that include an entity that is only required to comply with the standard because of the specific requirement that is to be retired said entity should be removed from the applicability of the standard. An example of such is VAR-01, R5 where this requirement is the only requirement applicable to a PSE, but the PSE has not been removed from the Applicability of the standard in the red-line version posted for comment.

Group

Hydro One Networks Inc.

Sasa Maljukan

No

Yes

Hydro One very much appreciates the efforts of the SDT in trying to streamline and focus current standards to focus on requirement that impact to reliability. In addition to this, we hope that: - Phase II of this project will continue along the same path and advance the approach to other approved standards, and - Work on new and reviewed standards will include the criteria developed in this project (i.e. SDTs are fully directed to use Paragraph 81 criteria while developing new and reviewing existing standards).

Group

SERC EC Planning Standards Subcommittee

Jim Kelley

No

The comments expressed herein represent a consensus of the views of the above-named members of the SERC EC Planning Standards Subcommittee only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers"

No

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Individual

Kathleen Goodman

ISO New England Inc.

Agree

ISO RTO Council Standards Review Committee (SRC)

Group

SPP Standards Review Group

Robert Rhodes

No

Yes

Page 17 – The 6th through 12th lines are a stretch and do not add anything to the argument for retiring Requirement 3 of CIP-001-2a. It is conjecture on the part of the drafting team and should be removed from the paper. If the drafting team doesn't agree and keeps this portion, please insert the word 'require' between 'some' and 'corporate' in the 8th line. Also, delete 'to generic' in the 11th line. Page 26 – In the 10th line of the Technical Justification paragraph, insert 'task' between 'administrative' and 'that'. Page 29 – At the beginning of the 6th line of the Technical Justification paragraph, delete the 'is'. Page 32 – In the first line of the Criterion A paragraph, insert a 'not' between 'does' and 'promote'. Page 59 – In the 8th line of the 2nd paragraph, the sentence 'Thus,

IRO-016-1 R1 does not support reliability.’ doesn’t seem right. Shouldn’t this be; it does support reliability? Or perhaps you meant to say that R2 does not support reliability. Also, in the next sentence, delete the second ‘that’. Page 61 – In the 15th line of the Technical Justification paragraph, delete the ‘an’ in front of unnecessarily.

Individual

Michael Falvo

Independent Electricity System Operator

Yes

1. BAL-005-0.2b, R2 – agree 2. CIP-001-2a, R4 – we do not agree this is administrative in nature. Preparedness is an essential element in having the capability to readily respond to pressing reliability issues. Establishing contact with the enforcement authorities is a necessary component in preparing for reporting suspect or detected sabotage. Such reporting can help protect or minimize damages to BES facilities and/or Adverse Reliability Impact due to malicious acts. R1 to R3 do not have such a requirement to report sabotage events to the law enforcement authorities. If these authorities are included in Requirement R3, then the gap may be considered filled and R4 can be retired. However, this is not yet the case. We therefore suggest that R4 not be retired at this time. 3. CIP-003-3, -4 R1.2 – agree 4. CIP-003-3, -4 R3, R3.1, R3.2, R3.3 – while we agree that having the exception documented and approved by Senior Manager adds little to reliability, we do not agree that the entire requirement should be removed since this requirement is intended for implementing control of an entity’s adherence to its Cyber Security policy, or document exceptions otherwise. Further, we do not concur with the SDT’s view that over time, responsible entities may believe they can exempt themselves from compliance with the CIP requirements. Entities may exempt themselves from having some of their processes/procedures for cyber security not implemented, but their adherence to the policy and documenting exceptions are to be assessed during audit, which is not determined by the entities themselves. Any deviation from the requirement (the proposed “making exemption from compliance with the CIP requirement”) will be identified and the entities will be found non-compliant. 5. CIP-003-3, -4 R4.2 – we agree that the action to classify the CCA information is redundant, but we do not think R4.2 can be removed entirely since the element “based on the sensitivity of the Critical Cyber Asset information” needs to be retained. Suggest to revise R4 to capture this element, or, at a minimum, consult the CIP SDT on the merit of retaining this element in R4. 6. CIP-005-3a, -4a R2.6 – agree. 7. CIP-007-3, -4 R7.3 – agree. 8. COM 001-1.1 R6 - agree. 9. EOP-004-1 R1 – we do not agree with retiring this requirement. The RRO should have a formal reporting procedure in place to ensure adequate and detailed reporting is provided on system disturbances or any unusual event. This procedure is necessary for entities to meet the goals of further requirements in this standard that pertain to preliminary and final disturbance reporting . 10. EOP-005-2 R3.1 – agree. 11. EOP-009-0 R2 – agree. 12. FAC-002-1 R2 – we do not agree that the requirement is burdensome. The requirement seems to meet the overarching criterion A from the White Paper (it requires responsible entities to conduct an activity or task that does little, if anything, to benefit or protect the reliable operation of the BES), however, at a careful reading, the requirement seems to fail meeting at least one of the Criteria B: B1 (it is administrative, but not burdensome), B2 (it is data collection/retention, but we are not sure if NERC collects this data by any other method), B3 to B6 (it does not seem to fit any of these criteria). 13. FAC-008-1 R1.3.5 – agree. 14. FAC-008-1 R2; FAC-008-1 R3; FAC-008-3 R4; FAC-008-3 R5 – agree. 15. FAC-010-2.1 R5; FAC-011-2 R5 – agree. 16. FAC-013-2 R3 – agree. 17. INT-007-1 R1.2 – agree, but there needs to be a requirement somewhere to stipulate that all entities involved in the Arranged Interchange must register with NERC such that transactions’ participants can be contacted for confirmation of transactions being approved or to make changes when transactions are curtailed. Until such time that this requirement is developed elsewhere, INT-007-1 R1.2 should remain in effect. 18. IRO-016-1 R2 – It does not make sense to retire this requirement, but still keep M1 – the measure associated with requirement R1 - in the standard. M1 states that each RC must have evidence, such as operator log or another data source, of actions taken for the event or disagreement or both. However, R2 is the requirement which states the RC shall document the actions taken via operator log or another data source. Therefore, removing R2 would create inconsistency in the standard. 19. NUC-001-2 R9.1; NUC-001-2 R9.1.1; NUC-001-2 R9.1.2; NUC-001-2 R9.1.3; NUC-001-2 R9.1.4 we agree with retiring all of the 9.1, except R9.1.2: The agreement should contain the names of the applicable entities and the responsibilities assigned to each one in relation to the NPIR. 20. PRC-008-0 R1; PRC-008-0 R2; PRC-009-0 R1; PRC-009-0 R1.1;

PRC-009-0 R1.2; PRC-009-0 R1.3; PRC-009-0 R1.4; PRC-009-0 R2; PRC-010-0 R2; PRC-022-1 R2 – agree. 21. TOP-001-1a R3 – agree. 22. TOP-005-2a R1 – agree. 23. VAR-001-2 R5 – agree.

No

Individual

Orlando Ciniglio

Idaho Power Company

No

No

Group

ACES Standards Collaborators

Jason Marshall

No

(1) We do not see any reliability gaps created by the proposed retirements. Many of the requirements that have been moved to the second phase of the project could actually be retired in this phase without creating reliability gaps. We believe the approach to move several requirements to the second phase is overly conservative. However, we understand that drafting team must balance the retirement of requirements in this phase with satisfying concerns of stakeholders that no reliability gaps are created. (2) We are not opposed to the plan to review the linkages between BAL and INT standards in the next phase. However, we continue to believe that reloading of curtailed transactions is a commercial issue not a reliability issue. Thus, INT-004-2 easily meets criteria A and B and should be retired in phase one.

Yes

(1) On page 5, several requirements are marked with two asterisks but there is no footnote or additional information. Please indicate the purpose of the asterisks or remove them. (2) The supporting statement in the technical whitepaper and SAR that Criteria C is needed to make an informed decision “in the determination of whether a Reliability Standard requirement satisfies both Criteria A and B” is inconsistent with the actual Criteria. Criterion C2 questions if the requirement is being reviewed in an on-going standards development project. While this is certainly a relevant question and a valid reason to not include a requirement in the P81 project, the question simply provides no input on whether Criteria A and B are met. We suggest changing the supporting statement to be clearer that Criteria C in essence is more information to make an informed decision but may not necessarily have any indication on whether Criteria A and B are satisfied. (3) The supporting statement in the technical whitepaper and SAR that Criteria C provides “additional information to assist in the determination of whether a Reliability Standard requirement satisfies both Criteria A and B” is inconsistent with the SAR. In the detailed description, the SAR states that the initial phase shall only identify requirements that satisfy both Criteria A and B. These are supposed to be the requirements that easily meet these two criteria sets. Thus, why is Criteria C evaluated in the whitepaper. If these criteria are easily met, Criteria C is not needed to assist in the determination and the associated information while interesting would appear to be superfluous.

Group

Southwest Power Pool Regional Entity

Emily Pennel

No

While CIP-007-3/4, Requirement R7.3 by itself has no immediate impact on the reliability of the Bulk Electric System, performance of R7.3 is required by the entity in order to be able to demonstrate compliance with CIP-007-3, Requirements R7.1 and R7.2 that, if not performed properly, could result in an impact to reliability. Elimination of this requirement could expose the registered entity to greater

risk of non-compliance with the remaining requirements as it no longer requires the entity to maintain appropriate and sufficient evidence of performance with the remaining requirements. For the reasons described, the SPP RE is opposed to retiring CIP-007-3/4, Requirement R7.3.

Yes

The white paper discussion for CIP-007-3/4, Requirement R7.3 proffers the idea that most data and information is collected for ERO compliance monitoring purposes outside of the context of Reliability Standards. While this might be the case of other standards, the SPP RE does not believe this is the case for the CIP-002 through CIP-009 Cyber Security standards, collectively referred to as the "CIP standards." The CIP standards require the entity to produce a document (e.g., policy, program, procedure, process, or list); to implement a documented program, process, or procedure; and/or to perform and document certain measurable procedural steps. In the absence of disposition records, which are specifically not required by CIP-007-3/4, Requirements R7.1 and R7.2, there will unlikely be any data or information outside of the context of the Reliability Standards demonstrating compliance with R7.1 and R7.2. The authors of the white paper appear to object to the maintenance of process documentation in this instance yet do not object to other requirements in the CIP standards that similarly call for the production and maintenance of documentation. The SPP RE is concerned that the authors of the white paper have chosen to focus on individual requirements in a stand-alone manner and have failed to understand the supportive interrelationships of the CIP standards and their requirements.

Group

Southern Company

Antonio Grayson

No

Yes

FAC-002-1 R2-The comments in the technical white paper concerning FAC-002-1 R2 are correct. Entities already have the obligation to provide the documentation of the evaluation of the reliability impact of new facilities upon request to demonstrate compliance to R1 and its sub-requirements, thus making R2 unnecessary. Furthermore, a requirement to retain documentation does not benefit or protect the reliable operation of the BES. VAR-001-2 R5: While Southern agrees that the elimination of VAR-001-2, R5 is appropriate, there is some concern that the justification that the TOP's adherence to R2 as a double check to ensure there are sufficient reactive power resources to protect the voltage levels under normal and Contingency conditions may be viewed by FERC as redirecting the burden from the PSEs and LSEs to the TOP. The LSE's (particularly) need to make their reactive resources available to the TOP in order for the TOP to acquire/use these reactive resources to protect voltage levels. Also, consider that not all entities necessarily take service under a transmission tariff, so references to other contractual mechanisms such as Interchange Agreements, etc. might be cited in the Technical White Paper for ensuring sufficient reactive resources are provided and made available by transmission customers.

Individual

Brett Holland

Kansas City Power & Light

No

No

Individual

Jason Snodgrass

Georgia Transmission Corporation

No

Yes
<p>GTC is very supportive of the recent ERO, Regional Entity and industry stakeholder efforts in response to the opportunity provided by FERC in paragraph 81 of the Find, Fix, Track and Report Order to review and eliminate standards that provide no or minimal reliability benefits. However, we are disappointed with the small number of requirements that are proposed for retirement in this initial phase of work. GTC would like to note that because duplicative requirements for subsequent versions of Reliability Standards are never mandatory at the same time, the net impact of requirements being proposed for retirement identified in the "Redline of Standards with Proposed Retirements" for phase 1 is only 28 out of 1650 FERC approved requirements or 1.7%. This small percentage does not seem to reflect well on the view that NERC's FFT initiative is predicated on, of which FERC has extended an invitation to justify without imposing a deadline. From our review of the P81 Technical White Paper, it appears that there are many more requirements in addition to the 28 identified that meet the criteria for deletion. And while a phased approach has been recommended, the certainty associated with subsequent phases occurring in a timely manner is questionable and GTC recommends a big picture approach. We believe the small number of requirements identified in phase I would be more palatable if a big picture perspective was provided once submitting to FERC. For example, a breakdown similar to the one below would provide more confidence that future phases would occur and be successful:</p> <ul style="list-style-type: none"> • At the end of the day, we believe we can eliminate approximately xx number or xx percentage of requirements • This will be completed in three phases • Phase one will include approximately xx requirements, posted to FERC in fourth quarter, 2012 • Phase two will include approximately xx requirements, posted to FERC in xx quarter, 2013 • Phase three posting will... <p>Laying out the bigger picture keeps the momentum going and also let's FERC know that the first posting only begins to scratch the surface of the issue. Furthermore, we are aware of current standards drafting teams that are drafting requirements that would meet the criteria for deletion stated in this Technical White Paper. There is a pressing need to implement a mechanism to ensure "P81-qualified" requirements are not drafted going forward or eliminated prior to NERC BOT approval. GTC will continue to support this effort as it moves through the NERC standards development process and participate in future phases of work related to the P81 project. Our goal is to ensure future phases of this effort lead to retirement of a much greater number of requirements that are not necessary for the reliability of the BES.</p>
Individual
Daniela Hammons
CenterPoint Energy
No
CenterPoint Energy believes that the Reliability Standard requirements proposed for retirement in the initial phase ("Phase 1") of NERC Project 2013-02 'Paragraph 81' would not create a gap in reliability if they were retired. An increase in efficiency of the ERO compliance program should result with the removal of these Phase 1 requirements and the removal of additional Reliability Standard requirements in subsequent phases of this project.
No
Individual
Oliver Burke
Entergy Services, Inc. (Transmission)
No
No
Group
ISO/RTO Standards Review Committee
Albert DiCaprio

The SRC has not identified any reliability gaps caused by the proposed actions, but the SRC believes that there is value in retaining some of the deleted requirements in some other form. Documentation is not an Operating or Assessment obligation but it is a unique topic Chain-of-command should be addressed as a Certification issue or as a Assumption / Definition Issue The following requirements while not appropriate as mandatory Reliability Standards should be retained in some category (highlighted text is a proposed category) BAL-005-0.2b R2 (Current Industry Operating Practice) CIP-003-3 R1.2 CIP-003-3 R3 CIP-003-3 R4.2 CIP-003-4 R3 CIP-003-4 R3.1 CIP-003-4 R3.2 CIP-003-4 R3.3 CIP-003-4 R4.2 CIP-005-3a R2.6 CIP-005-4a R2.6 CIP-007-3 R7.3 CIP-007-4 R7.3 EOP-004-1 R1 (Industry Reports) EOP-005-2 R3.1 (Annual check-up / inspection) FAC-002-1 R2 --- FAC-008-1 R2 (Chain-of-Command) FAC-008-1 R3 --- FAC-008-3 R4 (Chain-of-Command) FAC-008-3 R5 --- FAC-010-2.1 R5** (Current Industry Assessment Practice) FAC-011-2 R5** (Current Industry Assessment Practice) FAC-013-2 R3 (Business Practice – NAESB) IRO-016-1 R2 (Documentation) NUC-001-2 R9.1 (Current Industry Operating Practice) NUC-001-2 R9.1.1 (Annual check-up / inspection) NUC-001-2 R9.1.2 (Documentation) NUC-001-2 R9.1.3 (Documentation) NUC-001-2 R9.1.4 (Certification) PRC-010-0 R2 (Current Industry Assessment Practice) PRC-022-1 R2 (Documentation) Please note the IESO will submit its own comments regarding the following requirements: CIP-001-2a R4 CIP-003-3 R3.1 CIP-003-3 R3.2 CIP-003-3 R3.3 CIP-003-4 R14.2 INT-007-1 R1.2 (Certification) VAR-001-2 R5** (Business Practice – NAESB)

Yes

The SRC agrees with the removal of the identified requirements. The SRC recognizes that the scope of this SAR is to identify inappropriate requirements and not necessarily to suggest what to do with those identified requirements for removal. The SRC suggests that the Technical White Paper recognize that some of these removed requirements can and should be retained (just not retained as Reliability Standards). See response to Q1 for suggestions.