Unofficial Comment Form

Standards Efficiency Review

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System](https://sbs.nerc.net/) to provide feedback on the **Standards Efficiency Review (SER) Standards Authorization Request**. Comments must be submitted by **8 p.m. Eastern, Tuesday, July 10, 2018.**

Additional information about this project is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Standards-Efficiency-Review.aspx). If you have questions, contact Manager of Standards Information, Chris Larson (via email) or at 404-446-9708.

**Background**

Many NERC Reliability Standards have been mandatory and enforceable for 10+ years in North America. Phase 1 of the SER project seeks to identify requirements that are potential candidates for retirement because they are no longer essential for reliability. Retiring these requirements would increase efficiencies by reducing regulatory obligations and/or compliance burden. Using a risk-based approach, three SER teams [Real-time Operations (RT), Long-term Planning (LT), and Operations Planning (OP)] evaluated the reliability benefit of each requirement in the body of NERC Reliability Standards. Based on the analyses, the SER teams are recommending the requirements listed in this posting be retired. The SER Team maintains that these requirements can be retired without impacting any other standards; i.e., no modifications to other requirements in other standards are necessary. Phase 2 of the SER Project will focus on modifying and/or consolidating requirements throughout the body of standards.

## Questions

1. Do you agree with the recommendations and rationales to retire the proposed requirements? If not, please state the standard(s) and requirement number(s) in your response(s) along with your rationale(s) for not retiring the requirement(s).

[ ]  Yes

[ ]  No

Comments:

1. Are there any additional requirements that you contend could be retired without modifying any other requirement(s) and/or standard(s)? If so, please state the standard(s) and requirement number(s) in your response(s) along with your rationale(s) for retiring the requirement(s).

[ ]  Yes

[ ]  No

Comments: