

# Standards Announcement

## Project 2013-02 Paragraph 81

**Recirculation Ballot is now open through 8 p.m. Thursday, January 17, 2013**

### [Now Available](#)

A recirculation ballot window for the 20 standards with 36 requirements being proposed for retirement in this project is now open through **8 p.m. Eastern on Thursday, January 17, 2013.**

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.

After considering stakeholder comments from the formal comment period and initial ballot that ended on December 10, 2012, the drafting team made some minor clarifying changes to the technical white paper. Additionally, CIP-001-2a R4 and EOP-004-1 R1 were moved to the ‘Informational Purposes Only’ section in the technical paper, as EOP-004-2 has been filed with regulatory authorities and the EOP-004-2 implementation plan calls for the retirement of CIP-001-2a R4 and EOP-004-1 R1.

### **Instructions**

In the recirculation ballot, votes are counted by exception. Only members of the ballot pool may cast a ballot; all ballot pool members may change their previously cast votes. A ballot pool member who failed to cast a ballot during the last ballot window may cast a ballot in the recirculation ballot window. If a ballot pool member does not participate in the recirculation ballot, that member’s vote cast in the previous ballot will be carried over as that member’s vote in the recirculation ballot.

Members of the ballot pool associated with this project may log in and submit their vote for the standard by clicking [here](#).

**Next Steps**

Voting results will be posted and announced after the ballot window closes. If approved, the standards with requirements being proposed for retirement will be submitted to the Board of Trustees and then filed with the appropriate regulatory authorities.

**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 22 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,  
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