NPCC Members and Entities of the NERC Registered Ballot Body,

The subject ballot is currently open and closes at **8pm on April 9th, 2015**.

The NPCC Regional Standards Committee (RSC) has reviewed the subject revised standard and has not reached a consensus on a voting recommendation. The standard developer and Vice Chair of the Standard Drafting Team (SDT) participated in an RSC teleconference to discuss the revised version of the standard, currently posted at: [http://www.nerc.com/pa/Stand/Pages/Project-2014-04-Physical-Security.aspx](http://www.nerc.com/pa/Stand/Pages/Project-2014-04-Physical-Security.aspx)

This version of the standard is responsive to a Directive provided by the FERC and removes the word “widespread” from the term “widespread instability.” In deliberations between the RSC, SDT, and NERC, RSC expressed some concern that removal of the term “widespread” causes an increase in scope of the facilities that would be deemed critical and subject to the standard. The standard doesn’t attempt to place any type of stability criteria on what is or isn’t critical to Interconnection BES reliability. The standard’s supporting rationale does provide some suggested guidance on what may be used and in the view of NERC staff and the SDT, this allows sufficient latitude for the TO to perform a competent analysis. The ambiguity of the term widespread may remain, even with its removal, however sufficient flexibility seems to exist in the documentation to allow different methods of analysis and engineering judgement to be used to derive a set of critical stations and substations.

NPCC as the Regional Entity will be supporting the revision and voting **“Affirmative.”**

If you have any questions please contact me.

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