NPCC Members and Entities of the NERC Registered Ballot Body,

A 45-day comment period for the subject standard project is open through **8 p.m. Eastern, Friday, September 14, 2018**. The Implementation Plan has been updated to reflect a revised compliance date. NERC has also extended the comment period to provide stakeholders adequate time to review the updated documents and provide meaningful feedback. Additional ballots for the standard and implementation plan, and a non-binding poll of the associated Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) are currently underway- **September 5-14, 2018**.

The System Protection and Control Subcommittee (SPCS) and the System Assessment and Modeling Subcommittee (SAMS) conducted an assessment of protection system single points of failure in response to FERC Order No. 754, including analysis of data from the NERC Section 1600 Request for Data or Information. The assessment confirmed the existence of a reliability risk associated with single points of failure in protection systems that warrants further action. The NERC Standard Drafting Team addressed the two directives from FERC Order No. 786 (p. 40 and p. 89) and updates to the MOD reference in Requirement R1, Measure M1 and the Violation Severity Levels sections have been added to the scope of the project.

The Regional Standards Committee (RSC) has reviewed the standard’s proposed revisions and no member has indicated any issue or intent to not support all the items up for ballot and poll. As such, NPCC as the Regional Entity believes the Directives were adequately addressed and the revised standard supports reliable operation of the BPS therefore will be casting an **Affirmative** ballot and a **Positive** opinion in the non-binding poll. If you have any questions please contact me.

Thanks,
Guy V. Zito
Chair RSC
NPCC Asst. Vice President Standards