NPCC Members and Entities of the NERC Registered Ballot Body.

The NPCC Regional Standards Committee (RSC), with input from the Task Force on Infrastructure Security and Technology have reviewed the subject standard and materials posted for ballot through 8pm October 30, 2017. The RSC and TFIST have not reached a consensus on a ballot position however the majority of members with voting positions have indicated they will be voting Negative on this version of the subject standard. The main issue involves the calculation in the attachment. Specifically, what is considered and weighted when performing the calculation and what should be part of the calculation, and what shouldn’t be, when determining whether a medium impact Control Center (or backup Control Center) should be moved to a high impact lacks clarity. This could lead to variations in how the calculation is performed and create issues during audits. Also, some believe that the approach is creating a definition for what constitutes a Control Center outside of the normal process as defined by the NERC Standards Processes Manual. There will be comments made to improve the clarity of what is to be considered when performing the calculation.

In consideration of the concerns raised, NPCC will cast an abstention for this ballot.

If you have any questions please contact me.

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