

**From:** [Guy V. Zito](#)  
**To:** [rsballot](#)  
**Cc:** [rscmembers](#)  
**Subject:** NERC Ballot on Standards Efficiency Review (SER) Retirements Phase 1  
**Date:** Wednesday, April 10, 2019 9:08:21 AM  
**Importance:** High

---

NPCC Members and Entities of the NERC Ballot Body,

The subject project and associated set of standards currently is posted for comment and ballot **through 8pm April 12, 2019**. The NPCC Regional Standards Committee has not reached consensus ballot positions on all of the standards.

Some members have indicated their organization is NOT supporting retirement for the following standard requirements and their reasons:

- 1) PRC-004-5(i) Requirement 4, some suggested that the ability to declare that “no cause of a misoperation was identified” be retained within the standard to document the end of an investigation. The removal of the ability to declare that no cause of a misoperation was identified may result in audit and compliance concerns. **NPCC, in the Regional Entity Sector, will cast a Negative Vote**
- 2) INT-010-2.1 Retire entire standard. Although conceptually the requirements are covered under NAESB WEQ standards there is a reference in INT-009-2.1 Requirement 1 that points back to INT-010-2.1. Some additional work will be required to remove that reference. It is suggested that this retirement be pursued as part of a Phase 2 SER effort. **NPCC, in the Regional Entity Sector, will cast a Negative vote**
- 3) FAC-008-3 R7 and R8, There is a FERC Order identified with this standard, dated March 18, 2010, Docket No. RR09-6-000. This order included FERC’s concerns regarding facility ratings and limiting elements. (Please see paragraph 13 and 14 of the FERC order.) Additional consideration is needed regarding the Facility Ratings requirements and the relationship to the data requirements of MOD-032, IRO-010, and TOP-003 to ensure that most limiting elements are determined. **NPCC, in the Regional Entity Sector, will cast an Abstention.**

The remaining standards, not shown above, have RSC consensus to vote **Affirmative** on the retirements.

If you have any questions please contact me.

Thanks,

Guy V. Zito  
Assistant Vice President-Standards  
Northeast Power Coordinating Council, Inc.  
1040 Avenue of the Americas, 10 th Floor  
New York, NY 10018  
212-840-1070  
212-302-2782 fax