Do not use this form for submitting comments. Use the Standards Balloting and Commenting System to submit comments on the Project 2016-02 Modifications to CIP Standards - IROL Modifications to CIP-002 SAR. Comments must be submitted by 8 p.m. Eastern, Friday, July 13, 2018.

Additional information is available on the project page. If you have questions, contact Jordan Mallory via email or at 404-446-2589.

### Background Information
This SAR transfers an issue currently within the scope of Project 2015-09 to Project 2016-02. The CIP SDT (project 2016-02) will work with the FAC SOL SDT (project 2015-09) on the modifications to CIP-002. The purpose of Project 2015-09 is to revise the requirements in the Facilities Design, Connections, and Maintenance (FAC) group standards for determining and communicating System Operating Limits (SOLs) to eliminate overlap with approved Transmission Planning (TPL) requirements, enhancing consistency with Transmission Operations (TOP) and Interconnection Reliability Operations (IRO) standards, and addressing issues with determining and communicating SOLs and Interconnection Reliability Operating Limits (IROLs). As part of that project, the FAC SOL SDT proposes retiring FAC-010-3 to eliminate overlap between the FAC standards and Reliability Standard TPL-001-4. With the retirement of FAC-010-3, Planning Coordinators and Transmission Planners would not be required to have a SOL methodology to identify SOLs and IROLs.

In making these modifications to the FAC Reliability Standards, the FAC SOL SDT determined CIP-002 needed revision because it references IROLs identified by Planning Coordinators and Transmission Planners. Specifically, the FAC SOL SDT recommends revising the medium impact rating criteria (2.6 and 2.9 in Attachment 1 of CIP-002) to account for the retirement of FAC-010-3. To make balloting more efficient for industry stakeholders and eliminate confusion from concurrent ballots of the same standard, NERC staff recommends balloting the changes provided by the FAC SOL SDT with the Project 2016-02 SDT revisions to CIP-002. The changes will be provided by the FAC SOL SDT and inserted by the CIP SDT into CIP-002. Because the Project 2016-02 SDT is also modifying CIP-002, NERC staff recommends consolidating the changes into one comment period and ballot. Both drafting teams will work closely together during this modification.
Questions

1. Do you agree with the scope and objectives of this SAR? If not, please explain why you do not agree, and, if possible, provide specific language revisions that would make it acceptable to you.

   Yes: 
   No: X

   Comments:

   For 2.6
   1) Recommend that there be a Requirement for the Planning Coordinator / Transmission Planner to notify the TOP/TO/GOP/GO that their location has been so designated.
   2) Recommend changing “identified” to “notified”.

   For 2.9
   Request clarification on how the TOP/TO/GOP/GO knows their RAS has been so designated. Does PRC-012-2 help clarify?

   We recommend that the proposed criteria language be removed from the SAR to provide the SDT maximum flexibility.

   We recommend that associated Guideline and Technical Basis “Technical Rationale” criterion information should be revised accordingly for changes made to the Impact Rating Criteria.

2. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.

   Yes: 
   No: X

   Comments:

3. Are there any other concerns with this SAR that haven’t been covered in previous questions?

   Yes: X
   No:

   Comments:

   We recommend that the Guidelines and Technical Basis “Technical Rationale” for Criterion 2.3 be revised to reference TPL-001-4, instead of TPL-003.