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**Subject:** NERC Formal Comment Period and Initial Ballot FAC-008-4  
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NPCC Members and Entities of the NERC Registered Ballot Body.

Currently a 45-day comment period for FAC-008-5 Facility Ratings is **open through Wednesday, January 13, 2021**. The initial ballot for the standard and a non-binding poll of the associated Violation Risk Factors and Violation Severity Levels is being conducted January 4-13, 2021. The Standards Efficiency Review (“SER”)Standard Authorization Request (SAR) drafting team evaluated NERC Reliability Standards using a risk-based approach to identify potential efficiencies through retirement or modification of Reliability Standard Requirements. The drafting team identified potential candidate requirements that are not essential for reliability, could be simplified or consolidated, and could thereby reduce regulatory obligations and/or compliance burden.

As part of the SER Phase 1 retirements previously proposed, NERC proposed retiring Requirement R7 **and** Requirement R8 of FAC-008-3. Proposed FAC-008-4 was approved by final ballot on May 2, 2019 and adopted by the BOT on May 9, 2019. NERC subsequently filed a Petition with FERC on June 7, 2019 for approval of proposed Reliability Standard FAC-008-4.

On September 17, 2020, FERC issued an Order approving the retirement of 19 Reliability Standard requirements, however remanded proposed FAC-008-4, specifically the retirement of R8 for further consideration by NERC. This proposal would reaffirm the original proposal to retire R7 **but retain R8**.

**NPCC as the Regional Entity will be voting Affirmatively and casting a Positive Opinion on the non-binding poll.** The Regional Standards Committee has not identified any opposition to this position.

If you have any questions please contact me.

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