

**Justification for No Material/Non-Substantive Changes,
Made by the Delegated Letter Order in Docket No. RD16-9-000 (Petition of the
North American Electric Reliability Corporation for Approval of Proposed
Reliability Standard COM-001-3)**

On August 15, 2016, the North American Electric Reliability Corporation (NERC) filed a petition for Commission approval, pursuant to section 215(d)(1) of the Federal Power Act (FPA)¹ and Section 39.5 of the Commission's regulations², of proposed revised Reliability Standard COM-001-3 (Communications). NERC also seeks approval of the associated implementation plan, the retirement of the currently-effective Reliability Standard COM-001-2.1, and the Violation Risk Factors and Violation Severity Levels associated with new Requirements R12 and R13 proposed in Reliability Standard COM-001-3.

NERC states in its petition that the proposed revised Reliability Standard COM-001-3 "revises Reliability Standard COM-001-2.1 pursuant to the Commission's directive in Order No. 808, by adding new Requirements R12 and R13 to expressly require applicable entities to have internal Interpersonal Communication capabilities for the exchange of information necessary for the Reliable Operation of the BES."³ NERC states that "[t]he proposed Requirements would ensure that Reliability Standard COM-001-3 clearly address internal Interpersonal Communications capabilities that could involve the issuance or receipt of Operating Instruction or other communication that could impact reliability. This would include, for example, internal Interpersonal Communications capabilities for control centers within the same functional entity (including geographically separate control centers) and/or between a control center and field personnel."⁴

The Commission approved NERC's uncontested petition in a Delegated Letter Order, issued 10/28/2016⁵, effective as of July 1, 2016.

FERC is not changing the way the collection is being done, and is not modifying the burden, cost or respondents, and sees this as a non-material or non-substantive change to a currently approved collection. There is no requirement for Federal Register notices for a no material/non-substantive change, however, FERC issued a 60-day Notice (81 FR

¹ 16 U.S.C. § 824o (2012).

² 18 C.F.R. § 39.5 (2016).

³ NERC petition.

⁴ *Id* at 12.

⁵ https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14507852

FERC-725V (OMB Control No. 1902-0277)

86706) on 12/01/2016 and received no comments. In addition, FERC issued a 30-day Notice (82 FR 24966) on 05/31/2017.