

Consideration of Comments

Project 2010-02 Connecting New Facilities to the Grid

The FAC Standard Drafting Team (SDT) thanks all commenters who submitted comments on the Standard Authorization Request (SAR). The SAR was posted for a 30-day public comment period from December 12, 2013 through January 17, 2014. Stakeholders were asked to provide feedback on the SAR and associated documents through a special electronic comment form. There were 26 sets of comments, including comments from approximately 100 different people from approximately 72 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

After reviewing all stakeholder comments on the SAR, along with Order 693 directives related to FAC-002-0, the recommendations of the Independent Experts Review Project, Phase 1 Paragraph 81 suggestions, and the recommendations of the Integration of Variable Generation Task Force (IVGTF), the SDT proposed the following key changes to FAC-001:

- Revised the title and purpose to reflect the language in the requirements.
- Removed the reference in R1 to: "...compliance with NERC Reliability Standards and applicable Regional Entity, subregional, Power Pool, and individual Transmission Owner planning criteria and Facility connection requirements" because it is redundant with FAC-002, R1.2.
- Moved all of the subparts in R3, except for what are now R3.1 and R3.2, and to the Guidelines and Technical Basis section. The SDT wants to provide entities with the flexibility to determine the Facility interconnection requirements that are technically appropriate for their respective Facilities. Including them as subparts of R3 was deemed too prescriptive, as frequently some items in the list will not apply to all applicable entities – and some applicable entities will have requirements that expand upon the list. The Guidelines should be used as a starting point for each Transmission Owner and applicable Generator Owner to consider in the development of Facility interconnection requirements.
- Modified R3 to ensure that the impact on third parties "(affected system(s))" is appropriately addressed.
- Retired R4.
- Updated all compliance elements: updated the Measures to add examples of acceptable evidence; modified the VSLs for conformance with the updated requirement language; modified the VRFs for conformance with NERC's VRF guidelines; added Time Horizons to each requirement.

The SDT made the following key changes to FAC-002:

- Revised the title and purpose to reflect the language in the requirements.

- Rearranged the order of Functional Entities in the Applicability section to reflect the order in the Functional Model; changed “Planning Authority” in the applicability section to “Planning Coordinator” to reflect the Functional Model, as well as the recently revised TPL-001-4; added “Applicable Generator Owner” to the Applicability section so that R4 does not require a reference to FAC-001.
- Separated R1 into four requirements to add clarity and better distinguish the actions required of the applicable entities.
- Revised the subparts of R1 to remove elements that are more appropriate for Measures.
- Modified R1.1 to ensure that the impact on third parties (“affected system(s)”) is appropriately addressed.
- Modified R1.4 to remove the reference to the TPL Reliability Standards to avoid redundancy with the R1.2 reference to “all NERC Reliability Standards.”
- Updated all compliance elements: added Measures, VRFs, and Time Horizons to each requirement; modified the VSLs for conformance with the updated requirement language

Throughout both standards, the SDT also ensured that all Facilities in question were described as “new or materially modified.” The intended meaning of “materially modified” is explained in the Guidelines and Technical Basis section of each standard. The SDT also changed all references to “Facility connection requirements” to “Facility interconnection requirements.”

NOTE: Both FAC-001-2 and FAC-002-2 have been transferred to the new NERC Reliability Standard template. While the format is different than in the currently enforceable FAC-001-1 and FAC-002-1, the content has not changed except to update the boilerplate compliance language (which is not redlined, as it was a NERC-required change rather than an SDT-proposed change).

Below, the SDT has provided its direct responses to the SAR comments:

General Comments

- Some commenters suggested that both FAC-001 and FAC-002 be retired. While the SDT agrees that standards that do not support reliability should be retired, it believes that requirements for interconnecting new Facilities still need to be addressed in NERC’s Reliability Standards -- regardless of what might be covered in a tariff or other entity-specific documents.
- Some commenters suggested that the Purpose statements of the standards be modified. The SDT has modified the Purpose statements of both FAC-001 and FAC-002 to better reflect the content of the standards.
- Some commenters requested that the SDT clarify its references to “third parties.” By “third parties,” the SDT means affected system(s) referenced in the proposed FAC-001-2 and FAC-002-2. This refers to an electric system other than the Transmission Owner’s or applicable Generator Owner’s electric system that may be affected by a proposed interconnection or on which a

proposed interconnection or addition of Facilities or upgrades may require modifications or upgrades to the electric system.

- One commenter suggested that the SDT not include time horizons in the standards. Time horizons are a required element in the new NERC Reliability Standard template and must be incorporated into the standards. They are used as a factor in determining the size of a sanction. If an entity violates a requirement and there is no time to mitigate the violation because the requirement takes place in real-time, then the sanction associated with the violation is higher than it would be for violation of a requirement that could be mitigated over a longer period of time.

FAC-001-2

- Some commenters expressed confusion about the planned use of a guidance document for the FAC-001 subparts. The SDT is proposing that most of the subparts of FAC-001 R3 be moved into the Guidelines and Technical Basis section of the standard to provide entities with the flexibility to determine the Facility interconnection requirements that are technically appropriate for their respective Facilities. Including them as subparts of R3 was deemed too prescriptive, as frequently some items in the list will not apply to all applicable entities – and some applicable entities will have requirements that expand upon the list. The Guidelines should be used as a starting point for each Transmission Owner and applicable Generator Owner to consider in the development of Facility interconnection requirements.
- One commenter suggested that the SDT add Transmission Service Provider to FAC-001. The SDT believes that any TSP requirement for an interconnection service agreement is typically captured in the operating agreement between the Transmission Owner and Transmission Service Provider. It would be redundant to require both entities to provide this information.
- One commenter suggested that the SDT delete the FAC-001, R1 subrequirements. The Facilities specified in R1.1-R1.3 require different Facility interconnection requirements for different kinds of Facilities and the SDT believes it is appropriate to acknowledge that.
- One commenter preferred the term “the interconnected,” as in the original standard, to “the affected,” as proposed for modification. The SDT intends to reference more than simply physically interconnected system(s). By “affected system(s),” the SDT means an electric system other than the Transmission Owner’s or applicable Generator Owner’s electric system that may be affected by a proposed interconnection or on which a proposed interconnection or addition of Facilities or upgrades may require modifications or upgrades to the electric system.
- One commenter suggested that the SDT review the IVGTF recommendations related to FAC-001. The IVGTF’s recommendations suggested adding additional detail to FAC-001-1, largely to account for the integration of variable generation, and they are generally inconsistent with the less-prescriptive direction of the SDT. Facility interconnection requirements are inherently inconsistent, and the proposed FAC-001-2 acknowledges that, while offering guidance (in the Guidelines and Technical Basis section) on the elements that should be considered for inclusion in Facility interconnection requirements. A Facility interconnection requirement standard

cannot be too prescriptive about what must be included in a requirement because each Facility is different, and each Facility is subject to different regional and Transmission Owner Planning criteria. The SDT did accept the IVGTF's suggestion to add "including specifications for minimum static and dynamic reactive power requirements" to better describe the Reactive Power requirements in the "Voltage, Reactive Power, and power factor control bullet."

FAC-002-2

- Some commenters stated that "coordinate" and "cooperate" are too vague, and thus FAC-002-2 R2, R3, and R4 should be deleted or modified. The SDT discussed whether "coordinate" and "cooperate" are appropriately measurable. The SDT maintains that "coordinate" and "cooperate" are about more than providing data, and thus cannot be replaced with a requirement to provide data, though that is one of many actions to which these requirements could refer. The SDT has modified the language of the proposed R2-R4 to add detail ("including but not limited to the provision of data") regarding the meaning of coordination and cooperation. But the requirement might also be satisfied with evidence of in-person and web- or phone-based meetings ("coordination and cooperation") among involved entities, or other evidence.
- Some stakeholders expressed concern that FAC-002 is redundant with the TPL standards, or that the reference to TPL standards within FAC-002 is problematic. The assessment requirement in FAC-002 is distinct from the TPL requirements; a Planning Assessment under TPL would be for *existing* Facilities or interconnections, whereas FAC-002 requires a similar kind of assessment to TPL, but it is an assessment for new or modified Facilities that may or may not end up interconnecting or upgrading. Once the Facilities are interconnected, they would be covered under the TPL standards, but until then, the potential impact is evaluated under FAC-002. Considerations for new or modified Facilities seeking to interconnect can only be included in TPL sensitivity studies after they have gone through FAC-002 assessments and it has been determined that the Facilities will actually interconnect. The Facilities being assessed under FAC-002 have not yet been confirmed as new or modified Facilities. Still, the SDT determined that a requirement to conduct studies in accordance with TPL Reliability Standards was redundant with the requirement to evaluate compliance with applicable NERC Reliability Standards. Thus, those two subparts of FAC-002-2, R1 have been merged.
- Some commenters were unclear on what constitutes a "modification" of a Facility in FAC-002. The SDT has revised the description to state "materially modified Facilities" on all references, and has provided additional information in the Guidelines section to explain that the definition of "material" can be up to engineering judgment: *Entities should have documentation to support the technical rationale for determining whether a Facility was "materially modified." Recognizing that what constitutes a "material modification" will vary from entity to entity, the intent is for this determination to be based on engineering judgment.*
- Some commenters requested that FAC-002 recognize the impact of other procedures/processes (related to tariffs, organized markets, etc.) on interconnection requirements. Regardless of

what is covered in a tariff, requirements for interconnecting new Facilities still need to be addressed in NERC's Reliability Standards. The requirement for Open Access Transmission Tariffs varies from region to region. FERC handles market-related documents like tariffs differently from reliability-related documents like standards, and reliability standards should not rely upon market-related documents to address reliability issues. FAC-002 attempts to address the consideration of other processes/procedures related to interconnection by requiring that studies include evaluations of compliance with applicable NERC Reliability Standards, regional, and Transmission Owner planning criteria.

- One commenter suggested that the reference to “power pools” in FAC-002-1 be removed. The SDT agrees and has removed the reference.
- One commenter suggested the retirement of the existing FAC-002 R2, and asked the SDT to consider retiring some of its proposed “new” requirements. Existing R2 in FAC-002-1 has been approved for retirement by FERC. The SDT hasn't created new obligations for entities; it has simply separated R1 into multiple requirements to better clarify the responsibilities of the respective entities.
- One commenter asked the SDT to consider special treatment of small end-user loads. All additions to the system are either covered under the TPL annual assessments or under FAC-002. Any special treatment of small end-user loads would be discriminatory.
- One commenter expressed concern that implementing the proposed requirement split in FAC-002 could be difficult for vertically integrated utilities. The SDT maintains that the split into the three “coordinate and cooperate” requirements is clearer than the current language in FAC-002 and that carving out special exceptions for vertically integrated utilities is unnecessary. The Functional Model would still require a vertically integrated utility to register as the separate Registered Entities, so the same processes and requirements would apply regardless of the way the utility is legally organized.
- One commenter stated that Transmission Planners shouldn't be responsible for identifying and resolving third-party issues in FAC-002. Transmission Planners and Planning Coordinators are required to study the reliability impact of integrating new or materially modified Facilities, but FAC-002 does not require them to identify and resolve any third party issues.
- One commenter suggested that Transmission Service Provider be added to FAC-002. Most Transmission Service Providers are already Transmission Planners or Planning Coordinators, and if a Transmission Service Provider is providing a planning function, then it might be a registration issue. This is not an issue that is appropriately addressed by adding Transmission Service Provider to this standard.
- One commenter stated that including both Distribution Providers and Load-Serving Entities in FAC-002 is redundant. The Functional Model is written so that both Distribution Providers and Load-Serving Entities have responsibilities when it comes to the interconnection of new Facilities and while there may be redundancy for some of these entities, both entities still need to be included.

- One commenter suggested that FAC-002 be clarified to ensure that the interconnecting entity bears the burden of meeting the connecting requirements. FAC-002 simply requires that studies are conducted and coordinated among involved entities. Any requirement related to the burden of meeting the connection requirements is outside the scope of this study and is not assigned to any of the entities in FAC-002.
- Several commenters requested R2 in the current FAC-002-1 be deleted. It has been approved for retirement by FERC and the SDT has deleted it.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Janet Smith	Arizona Public Service Company	X		X		X	X				
No Additional Responses													
2.	Group	Guy Zito	Northeast Power Coordinating Council										X
Additional Member		Additional Organization	Region	Segment Selection									
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10									
2.	David Burke	Orange and Rockland Utilities	NPCC	3									
3.	Greg Campoli	New York Independent	NPCC	2									

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
		System Operator																		
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1																
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1																
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10																
7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5																
8.	Kathleen Goodman	ISO - New England	NPCC	2																
9.	Michael Jones	National Grid	NPCC	1																
10.	Mark Kenny	Northeast Utilities	NPCC	1																
11.	Christina Koncz	PSEG Power LLC	NPCC	5																
12.	Helen Lainis	Independent Electricity System Operator	NPCC	2																
13.	Michael Lombardi	Northeast Power Coordinating Council	NPCC	10																
14.	Alan MacNaughton	New Brunswick Power	NPCC	9																
15.	Bruce Metruck	New York Power Authority	NPCC	6																
16.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																
17.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																

Group/Individual		Commenter			Organization		Registered Ballot Body Segment									
							1	2	3	4	5	6	7	8	9	10
18.	Roberto Pellgrini	The United Illuminating Company	NPCC	1												
19.	Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1												
20.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5												
21.	Brian Robinson	Utility Services	NPCC	8												
22.	Ayesha Sabouba	Hydro One Networks Inc.	NPCC	1												
23.	Brian Shanahan	National Grid	NPCC	1												
24.	Wayne Sipperly	New York Power Authority	NPCC	5												
25.	Ben Wu	Orange and Rockland Utilities Inc.	NPCC	1												
26.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3												
3.	Group	Russel Mountjoy	NERC Standards Review Forum		X	X	X	X	X	X						
		Additional Member	Additional Organization	Region	Segment Selection											
1.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6												
2.	Chuck Wicklund	Otter Tail Power Company	MRO	1, 3, 5												
3.	Dan Inman	Minnkota Power Cooperative	MRO	1, 3, 5, 6												
4.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6												

Group/Individual		Commenter			Organization	Registered Ballot Body Segment									
						1	2	3	4	5	6	7	8	9	10
5.	Kayleigh Wilkerson	Lincoln Electric System	MRO	1, 3, 5, 6											
6.	Jodi Jensen	Western Area Power Administration	MRO	1, 6											
7.	Joseph DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6											
8.	Ken Goldsmith	Alliant Energy	MRO	4											
9.	Mahmood Safi	Omaha Public Power District	MRO	3, 4, 5, 6											
10.	Marie Knox	MISO	MRO	2											
11.	Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6											
12.	Randi Nyholm	Minnesota Power	MRO	1, 5											
13.	Scott Bos	Muscatine Power & Water	MRO	1, 3, 5, 6											
14.	Scott Nickles	Rochester Public Utilities	MRO	4											
15.	Terry Harbor	MidAmerican Energy	MRO	1, 3, 5, 6											
16.	Tom Breene	Wisconsin Public Service	MRO	3, 4, 5, 6											
17.	Tony Eddleman	Nebraska Public Power District	MRO	1, 3, 5											
4.	Group	Brandy Spraker		Tennessee Valley Authority		X		X		X	X				
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Joshua David		SERC	1											

Group/Individual		Commenter		Organization		Registered Ballot Body Segment									
						1	2	3	4	5	6	7	8	9	10
2.	Josh Lewey		SERC	1											
3.	David DeLoach		SERC	1											
4.	Dennis Sears		SERC	1											
5.	Lee Thomas		SERC	5											
6.	Tony Segovia		SERC	5											
7.	Tom Vandervort		SERC	5											
5.	Group	David Thorne	Pepco Holdings Inc. & Affiliates			X		X							
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Michael Mayer	Pepco Holdings	RFC	1, 3											
6.	Group	Louisi Slade	Dominion NERC Compliance Policy			X		X		X	X				
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Randi Heise	Dominion	MRO	6											
2.	Connie Lowe	Dominion	RFC	5, 6											
3.	Michael Crowley	Dominion	SERC	1, 3											
4.	Mike Garton	Dominion	NPCC	5, 6											
5.	Louis Slade	Dominion	SERC	5, 6											
7.	Group	Colby Bellville	Duke Energy			X		X		X	X				
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Doug Hils	Duke Energy	RFC	1											
2.	Lee Schuster	Duke Energy	FRCC	3											
3.	Dale Goodwine	Duke Energy	SERC	5											
4.	Greg Cecil	Duke Energy	RFC	6											
8.	Group	Jason Mashall	ACES Standards Collaborators								X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
Additional Member		Additional Organization	Region	Segment Selection									
1.	Scott Brame	North Carolina Electric Membership Corporation	SERC	1, 3, 4, 5									
2.	John Shaver	Arizona Electric Power Cooperative	WECC	4, 5									
3.	Alisha Anker	Prairie Power	SERC	3									
4.	Noman Williams	Sunflower Electric Power Corporation	SPP	1									
5.	Mark Ringhausen	Old Dominion Electric Cooperative	SERC	3, 4									
6.	Mohan Sachdeva	Buckeye Power	RFC	3, 4									
7.	Bob Solomon	Hoosier Energy	RFC	1									
8.	Shari Heino	Brazos Electric Power Cooperative	ERCOT	1, 5									
9.	Patrick Woods	East Kentucky Power Cooperative	SERC	1, 3, 5									
10.	John Shaver	Southwest Transmission Cooperative	WECC	1									
9.	Group	Pamela Hunter	Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	X		X		X	X				
No Additional Responses													
10.	Group	Robert Rhodes	SPP Standards Review Group		X								
Additional Member		Additional Organization	Region	Segment Selection									
1.	Mo Awad	Westar Energy	SPP	1, 3, 5, 6									
2.	Greg Froehling	Rayburn Country Electric Cooperative	SPP	3									
3.	Bo Jones	Westar Energy	SPP	1, 3, 5, 6									

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
4.	Shannon Mickens	Southwest Power Pool	SPP	2																
5.	James Nail	City of Independence, MO	SPP	3																
6.	Kevin Ninceheler	Westar Energy	SPP	1, 3, 5, 6																
7.	Mahmood Safi	Omaha Public Power District	MR O	1, 3, 5																
8.	Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4																
9.	Harold Wyble	Kansas City Power & Light	SPP	1, 3, 5, 6																
11.	Individual	Jonathan Appelbaum	The United Illuminating Company		X															
12.	Individual	Ashley Stringer	Oklahoma Municipal Power Authority					X												
13.	Individual	Chuck Matthews	BPA/TPP		X														X	
14.	Individual	Anthony Jablonski	ReliabilityFirst																	X
15.	Individual	Michael Falvo	Independent Electricity System Operator			X														
16.	Individual	Shirley Mayadewi	Manitoba Hydro		X		X		X	X										
17.	Individual	Andrew Z. Puztai	American Transmisiion Company, LLC		X															
18.	Individual	Michelle D'Antuono	Occidental Energy Ventures Corp.						X											
19.	Individual	Chris Scanlon	Exelon Companies		X		X	X	X	X										
20.	Individual	Thomas Foltz	American Electric Power		X		X		X	X										
21.	Individual	Patti Metro	National Rural Electric Cooperative Association (NRECA)		X		X	X												
22.	Individual	Mitch Colburn	Idaho Power Co.		X															
23.	Individual	Scott Langston	City of Tallahassee		X															
24.	Individual	Bill Fowler	City of Tallahassee				X													
25.	Individual	Ayesha Sabouba	Hydro One		X		X													
26.	Individual	Christina Conway	Oncor Electric Company, LLC		X															

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Agree	Supporting Comments of "Entity Name"
N/A	N/A	N/A

1. Do you agree with this scope? If not, please explain.

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 1 Comment
Northeast Power Coordinating Council	No	Requirement R1.1 should be modified “to ensure that the impact on third parties is appropriately addressed” and include the definition of who the impacted third parties include.
Dominion NERC Compliance Policy	No	Dominion believes that the phrase ‘power pool’ should be removed from FAC-002-1 as we believe that any such planning criteria should have been incorporated into NERC, regional, subregional or Transmission Owner planning criteria by now.
ACES Standards Collaborators	No	(1) We question the need for these two standards at all because of the minimal benefit to reliability of the Bulk Electric System. Nearly all TPs and PCs are subject to performing facility connection studies and having facility connection requirements in a FERC-approved tariff. Even most of those TPs and PCs that traditionally have not been subject to FERC wholesale power regulation have approved tariffs due to the reciprocity requirements that FERC established in the pro forma tariff. That is if they don’t have a reciprocal arrangement (i.e. a tariff), their associated PSE, LSE, and other applicable functions do not qualify for transmission service on a FERC-approved tariff. For the few areas where this is not true, the areas tend to have minimal impact on the BES. Thus, all of the requirements in FAC-001 and FAC-002 would appear to meet Paragraph 81 (criterion B7 - Redundant) because these requirements are already covered by another governmental regulation that requires tariff. We recommend that the SAR be modified to

Organization	Yes or No	Question 1 Comment
		<p>consider other alternatives, such as retirement of these requirements, as these standards are not needed at all.(2) In addition, we do have issues with specific scope items identified in the SAR regarding FAC-002 and discussed below. We do not believe that R1 should be split into separate requirements. Rather, if FAC-002 persists, we think R1 should be revised to refocus the need for the TP and PC to perform assessments on the integration of new or modified facilities. We do not believe additional requirements are necessary to “coordinate and cooperate” because coordination and cooperation are vague and problematic for measuring compliance. These activities are essentially about supplying information. There are already FERC approved tariff requirements that compel the sharing of this information. Thus, the SAR scope should be adjusted accordingly. (3) The scope should be modified to remove the reference in the FAC standards to the TPL standards. PCs and TPs must comply with the TPL standards regardless of what this standard requires. Thus, stating that an evaluation is required per the TPL standards will result in double jeopardy. Because failure to comply with the TPL standards for new or modified facilities will result in a compliance violation of FAC-002. (4) FAC-002 is redundant with the TPL standards and the SAR should be modified to remove these redundancies. TPL-001-4, R1, Part 1.1.3 and R1.3.8 of TPL-001-0.1, TPL-002-0b, and TPL-003-0b already require the PC and TP to evaluate the impacts of new or modified facilities in their TPL assessments. The SAR should be modified to consider the continued need for separate standards and requirements given these TPL requirements are already in existence. The SAR should be clear that if the standards are maintained that technical justification for retaining the requirements should be supplied given the apparent redundancies. (5) We support that the SAR calls for the elimination of redundancy and retirement of requirements with no impact to the reliable operation of the BES through application of the Paragraph 81 criteria. However, we are concerned that the P81 criteria</p>

Organization	Yes or No	Question 1 Comment
		<p>may have not been applied to all requirements based on the posted redline standard. Existing FAC-002-1 R2 would appear to meet Paragraph 81 (criteria B2 - Data Collection/Data Retention, B3 - Documentation, and B4-Reporting). Furthermore, some of the new proposed requirements appear to do little to support reliability. We understand that the redlined standards were written for illustrative purposes and are not an official proposed draft standard. Thus, we will not belabor the point further but encourage the ultimate standards drafting team to include a thorough review of existing and proposed new requirements against Paragraph 81 criteria. If the standards drafting team retains any requirements that appear to meet Paragraph 81 criteria, then significant technical justification should be provided.</p>
SPP Standards Review Group	No	<p>In R1 of FAC-002-1 modification of Facilities is a trigger for conducting assessments of the impact on affected Transmission systems. Has the drafting team given any consideration to providing criteria to use to determine specifically which modifications would be included? For example, changing CTs/PTs on a Facility may have an impact on the BES and need to be factored into interconnection assessments. Would line uprates, such as reconductoring, trigger a similar assessment even though the impact on the BES would in general be positive? Do we need to include clarification within the standard to help the industry decide when to initiate assessments?</p>
The United Illuminating Company	No	<p>Add For FAC-001 R1.1 thru R1.3 should be removed. Add For proposed FAC-002 R5 should be removed since its documentation and data retention. If it must be retained then it should be split up by Entity Type for clarity.</p>
ReliabilityFirst	No	<p>ReliabilityFirst submits the following comment on SAR Under the third bullet under the “Per the FAC Five-Year Review Team Recommendation to Revise FAC-002-1, the drafting team should consider:” section,</p>

Organization	Yes or No	Question 1 Comment
		<p>ReliabilityFirst has issues with using terms such as “coordinating and cooperating” within Reliability Standards. These terms are ambiguous and without being further prescribed, requirements with such terms will lead to confusion and interpretation. Instead of “coordinating and cooperating”, the SAR should speak to the Entities seeking to interconnect to provide the necessary data to the applicable Transmission Planners and Planning Coordinators in order to perform an assessment. Following the assessment, a joint review (though sharing of the assessment results) should be undertaken. ReliabilityFirst has also supplied draft changes to the FAC-001-1 and FAC-002-1 standards for consideration under a separate email to the NERC standards coordinator - Mallory Huggins.</p>
Exelon Companies	No	<p>There are three considerations we would recommend the Standard Drafting Team consider. First, the proposed draft FAC-002 standard seems to change the scope from a requirement for entities seeking to modify the transmission system to coordinate with the Planning Authority and Planning Coordinator to a scope that requires the Planning Authority and Planning Coordinator to perform assessments of new or modified facilities. We believe this is addressed as a requirement for the Planning Authority and Planning Coordinator to perform these assessments in the TPL standards? We think that the primary focus of FAC-002 should remain coordination, as it was, and not the assessment, which is already addressed in the TPL standards. Second, we think consideration should be given to whether the requirement R1.4 (R1.3 in revised draft) in FAC-002 is necessary. Similar to the first comment, this is already addressed in the TPL standards and is redundant here. Requirement 1.2 in the revised draft should be sufficient, it states that compliance with all NERC Reliability Standards shall be maintained, which includes the TPL standards. Third, for requirement R3 in the revised draft of FAC-002, we recommend that additional wording be added to allow handling the addition of smaller end-user loads to the transmission system through the normal annual reliability analysis</p>

Organization	Yes or No	Question 1 Comment
		performed by the Planning Authority or Planning Coordinator. We would recommend this for loads smaller than 20 MW. This would clarify that for these smaller end-user loads, it is not necessary for coordination to occur individually for each instance, but rather can be consolidated into the annual reliability analysis. We believe this is the most effective way to handle these smaller end-use additions.
National Rural Electric Cooperative Association (NRECA)	No	In general, NRECA agrees with the scope of the SAR in the context of completing Five-Year reviews of existing standards and in doing so eliminating redundancies, administrative burdens and addressing appropriate applicability concerns in standards. This being said, it appears that there are still improvements that can be made to address these areas as proposed in the red-line version of the standards included in this SAR. NRECA looks forward to commenting on these standards as the project continues through the development process.
BPA/TPP	Yes	However, it is not clear what is intended by the suggested guidance document referenced in the scope for FAC-001-1.
American Electric Power	Yes	AEP does not object to the proposed modifications if industry believes that these standards are indeed required for reliability. In fact, we find FAC-002-1 R1 through R4 to be much improved by clearly delineating what each functional entity is responsible for. As stated previously however, AEP believes these standards both have marginal (if any) benefit to the reliability of the BES. Entities would not and could not allow other entities to interconnect with them without the prescribed processes being met. As a result, we recommend that these two standards be eliminated in their entirety.
Idaho Power Co.	Yes	With the exception of the following: I do not agree that time horizons should be added to each requirement. I think the time horizon should be

Organization	Yes or No	Question 1 Comment
		<p>left to the TP to determine. Future year base cases and/or projected future conditions are based on assumptions. Modeling new interconnected generation and other facilities is immediately contrary to the existing future year assumptions. The TOP knows the most limiting conditions on its system and is then responsible for operating its system with the interconnected facility based on the studied conditions. The proposal to split R1 into three requirements seems reasonable. However, depending on how the proposal is implemented, confusion and/or unnecessary or redundant reporting may be added for vertically integrated utilities. In regards to impact to third parties, I don't think that TPs should be responsible for identifying and resolving third parties issues caused by modeling issues (i.e. transient data in base cases). Some specificity of "impact" may be beneficial, but may also create incremental challenges to the TP conducting a study if "impacts" is narrowly defined. The other proposed revisions seem reasonable.</p>
<p>Oncor Electric Company, LLC</p>	<p>Yes</p>	<p>With respect to FAC-001-1, Oncor agrees with the FAC FYRT's recommendation to consider retirement of R3.1 and R3.1.3 through R3.1.16 under Paragraph 81 criteria. The FYRT states that R3.1 and R3.1.3 through R3.1.16 are not necessary for reliability (Criterion A) and are redundant (Criterion B7) or generally too prescriptive to be contained in a standard. Oncor agrees with this statement. Regarding FAC-002-1, the proposed Purpose, "To avoid adverse impacts on reliability, assessments must be conducted and coordinated to determine whether a new or modified Facility meets Facility connection requirements", is written more like a measure than a purpose. Oncor recommends revising the language to better reflect the purpose of the Standard. It is Oncor's recommendation that the purpose of the Standard reflects that assessments must be conducted and coordinated to determine the impacts of integrating new or modified Facilities to the reliability of the Transmission system.</p>

Organization	Yes or No	Question 1 Comment
Arizona Public Service Company	Yes	
NERC Standards Review Forum	Yes	
Tennessee Valley Authority	Yes	
Pepco Holdings Inc. & Affiliates	Yes	
Duke Energy	Yes	
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
Oklahoma Municipal Power Authority	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
American Transmisiion Company, LLC	Yes	
Occidental Energy Ventures Corp.	Yes	
City of Tallahassee	Yes	

Organization	Yes or No	Question 1 Comment
City of Tallahassee	Yes	
Hydro One	Yes	

2. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 2 Comment
Dominion NERC Compliance Policy	No	Dominion suggests it include Transmission Service Provider. Given that authority for transmission planning (for a very large portion of the BES in the United States) has been turned over to ISO/RTOs, with governing provisions typically included in their respective tariffs, this entity needs to be included. See supporting comments in questions 4 & 5.
ACES Standards Collaborators	No	(1) For FAC-001 inclusion of the TO and GOs that own the interconnecting facility and receive an interconnection request is appropriate. However, we believe that the only applicable entities that should be included in the FAC-002 standard are the PC and TP. The PC and TP ultimately have the responsibility to plan for new facilities and already have existing FERC approved tariff processes to gather the necessary input from the TO, GO and LSE. Thus, requirements for TOs, GOs DPs, and LSEs to “coordinate and cooperate” are unnecessary and should be removed from the standard. (2) Inclusion of both the DP and LSE is redundant. It is the DP that will seek new end-user facilities because it provides and operates “electrical delivery facilities between the transmission system and the End-use Customer” per the NERC functional model. Furthermore, the Appendix 5B - Statement of Compliance Registry Criteria of the Rules of Procedure states very clearly that the DP will also be registered as the LSE “for all load directly connected to their distribution facilities” in Section III.a.4.

Organization	Yes or No	Question 2 Comment
National Rural Electric Cooperative Association (NRECA)	No	NRECA agrees that the applicability for FAC-001 is correct. For FAC-002, the applicability should be modified to include only the PC and TP. The PC and TP ultimately have the responsibility to plan for new facilities and already have existing FERC approved tariff processes to gather the necessary input from the TO, GO and LSE. Thus, requirements for TOs, GOs DPs, and LSEs to “coordinate and cooperate” are unnecessary and should be removed from the standard.
NERC Standards Review Forum	Yes	The NSRF noticed the statement under “Per the FAC Five-Year Review Team Recommendation to Revise FAC-001-1, the drafting team should consider: Modifying R3 to ensure that the impact on third parties is appropriately addressed”. Please assure that the SDT incorporates this statement to be applicable to Functional Entities per the Functional Model. There should not be a Federal Law (i.e. a Requirement) to speaks of coordinating with non-Functional Entities.
American Electric Power	Yes	It is current practice for a regional Transmission Service Provider (e.g. RTO) to specify and require an “Interconnection Service Agreement” for any new Interconnection customer facility (e.g. GO) to be connected and eligible to receive Transmission services. AEP recommends including the TSP in FAC-001’s “Applicability” scope, and making it subject to this standard requirement.
Arizona Public Service Company	Yes	
Northeast Power Coordinating Council	Yes	
Tennessee Valley Authority	Yes	
Pepco Holdings Inc. & Affiliates	Yes	

Organization	Yes or No	Question 2 Comment
Duke Energy	Yes	
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
SPP Standards Review Group	Yes	
The United Illuminating Company	Yes	
Oklahoma Municipal Power Authority	Yes	
BPA/TPP	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
American Transmisiion Company, LLC	Yes	

Organization	Yes or No	Question 2 Comment
Occidental Energy Ventures Corp.	Yes	
Exelon Companies	Yes	
Idaho Power Co.	Yes	
City of Tallahassee	Yes	
City of Tallahassee	Yes	
Hydro One	Yes	

3. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance:

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 3 Comment
Arizona Public Service Company	No	
Northeast Power Coordinating Council	No	
NERC Standards Review Forum	No	
Tennessee Valley Authority	No	
Pepco Holdings Inc. & Affiliates	No	
Dominion NERC Compliance Policy	No	
Duke Energy	No	
ACES Standards Collaborators	No	
Southern Company: Southern Company Services, Inc.; Alabama Power Company;	No	

Organization	Yes or No	Question 3 Comment
Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing		
SPP Standards Review Group	No	
The United Illuminating Company	Yes	For FAC-002 The revised standard should recognize that in organized markets like ISO-NE the Large Generator Interconnect Process and Process to integrate transmission Facilities is driven by ISO Procedures and Processes. Either in the measures or include in technical guidance to provide compliance guidance.
Oklahoma Municipal Power Authority	No	
BPA/TPP	No	
ReliabilityFirst		
Independent Electricity System Operator	No	
Manitoba Hydro	No	
American Transmisiion Company, LLC	No	

Organization	Yes or No	Question 3 Comment
Occidental Energy Ventures Corp.	No	
Exelon Companies	No	
American Electric Power	No	
National Rural Electric Cooperative Association (NRECA)	No	
Idaho Power Co.	No	
City of Tallahassee	No	
City of Tallahassee	No	
Hydro One	No	

4. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 3 Comment
Arizona Public Service Company	No	
Northeast Power Coordinating Council	No	
Tennessee Valley Authority	No	
Pepco Holdings Inc. & Affiliates	No	
Duke Energy	No	
ACES Standards Collaborators	No	
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company	No	

Organization	Yes or No	Question 3 Comment
Generation and Energy Marketing		
SPP Standards Review Group	No	
Oklahoma Municipal Power Authority	No	
BPA/TPP	No	
Independent Electricity System Operator	No	
Manitoba Hydro	No	
American Transmisiion Company, LLC	No	
Exelon Companies	No	
American Electric Power	No	
National Rural Electric Cooperative Association (NRECA)	No	
Idaho Power Co.	No	
City of Tallahassee	No	
City of Tallahassee	No	

Organization	Yes or No	Question 3 Comment
Hydro One	No	
NERC Standards Review Forum	Yes	Please see question 2. The NSRF is not aware of every Functional Entities' business practices when dealing with customers who wish connect to the electric system.
Dominion NERC Compliance Policy	Yes	Dominion believes that, in organized ISO/RTOs, where transmission planning has been turned over to that entity, interconnection requests are processed pursuant to the terms and conditions in the respective tariff. While we understand, and agree with the SDT, that a reliability standard is necessary to insure that no portion of the BES is excluded, we would like to see acknowledgement that, under these circumstances, the entity that has been delegated the planning authority bears some level of responsibility for compliance with these standards.
Occidental Energy Ventures Corp.	Yes	Although Occidental Energy Ventures Corp ("OEVC") believes that the intent of these two standards are already captured through other mandatory and enforceable mechanisms. In our view, the proposed streamlining of requirements and elimination of redundancy is a promising step in the right direction. Business practices and tariffs should be updated to address the minimum assessments of new Facilities that are necessary to assure that the reliability of the Bulk Electric System is not adversely affected. This would reflect the fact that existing interconnection obligations are very thorough - and the data showing that improper commissioning of facilities is not a major BES threat. At the same time, the two FAC standards could be retired under the Paragraph 81 criteria B7 item iii which states that the "Reliability Standard requirement is redundant with... (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board ("NAESB"), etc.). "

5. 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.

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 4 Comment
Arizona Public Service Company	No	
NERC Standards Review Forum	No	
Tennessee Valley Authority	No	
Pepco Holdings Inc. & Affiliates	No	
Duke Energy	No	
ACES Standards Collaborators	No	
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
SPP Standards Review Group	No	
Oklahoma Municipal Power Authority	No	
Independent Electricity System Operator	No	
American Transmisiion Company, LLC	No	
Occidental Energy Ventures Corp.	No	
Exelon Companies	No	
American Electric Power	No	
National Rural Electric Cooperative Association (NRECA)	No	

Organization	Yes or No	Question 4 Comment
Idaho Power Co.	No	
City of Tallahassee	No	
City of Tallahassee	No	
Hydro One	No	
Northeast Power Coordinating Council	Yes	FERC Tariff and Generator Interconnection Agreements include requirements that must be considered during this project. Specifically, section I.3.9 of the ISO-New England Tariff provides that new generation projects and project uprates, inter alia, must undergo a technical review by ISO-NE (with the assistance of NEPOOL task forces) to determine whether the project/uprate will have a "significant adverse effect on the stability, reliability or operating characteristics of the Transmission Owner's transmission facilities, the transmission facilities of another Transmission Owner, or the system of a Market Participant."
Dominion NERC Compliance Policy	Yes	Yes, certain FERC requirements related to Orders 888, 889, 1000 etc. which call for open transmission access. At the very least, the standards should acknowledge that, in some areas, the Transmission Owner has delegated the responsibility for planning of its Transmission system to another entity. Where this has been done, that entity may share some, or bear all, responsibility for compliance with these reliability standards.
BPA/TPP	Yes	The Large Generation Interconnection Procedures (LGIP) that have been put in place by applicable entities since FERC issued Order 2003-A need to be considered for consistency and possible redundancy.
Manitoba Hydro	Yes	This depends on the details that remain in the proposed "guidance document". For example, compliance of interconnections with Power Quality standards may be a provincial regulation administered by the local utility as opposed to a NERC standard requirement.

6. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Question 4 Comment
Northeast Power Coordinating Council	<p>“Modified” has been added to FAC-002-1 describing facilities. The word “new” is also used. “New” is clear, however, what constitutes a “modified” facility - 10% new, 50% new, 90% new? The Drafting Team should consider adding a Rationale Box explaining what is meant by “modified”.</p>
Dominion NERC Compliance Policy	<p>Dominion does not agree with the SDT recommendation to change the phrase “the interconnected’ to affected in FAC-001-1 @ R3.1 and R3.2. While Dominion believes the SDT wanted, and philosophically supports, the need to insure that the Facility connection requirements are coordinated with all whose Transmission system are affected by the interconnection of a new Facility, we believe the primary requirement should be that the entity’s procedures require notification and coordination of the assessment of new Facilities on the Transmission system to which the new Facility is interconnected. We could support language that also requires notification and coordination with those entities whose Transmission system is expected to be, or has been shown to be, affected by the new Facility. As examples we offer the following: R3.1- Procedures for notification and coordination of joint studies of new Facilities and their impacts on the interconnected Transmission system(s).R3.2. - Procedures for notification and coordination of joint studies to those responsible for the reliability of Transmission system(s) that are expected to be, or that have been shown to be, affected by the new Facility. Dominion suggests the words “or modified’ be struck from the purpose and requirements of FAC-002-1 as the SDT stated in the SAR that the intent of these FAC standards is to address only new facilities. According to the SAR, modifications are to be addressed through the TPL standards. Redline version of FAC-002-1; R5 should be removed per P81 (retirement of this requirement approved by FERC effective 1/21/14)</p>

Organization	Question 4 Comment
BPA/TPP	In general, facility connection requirements may be more focused on what is acceptable from an equipment perspective and may be more applicable during the design and implementation phases of an interconnection. These requirements may differ from requirements to conduct an assessment (e.g. LGIP requirements). The revised Standard should give consideration to having multiple sources for requirements rather than having entities develop redundant requirements.
Oncor Electric Company, LLC	It is Oncor’s understanding the intent and purpose of performing assessments under FAC-002-1 is to determine the impacts of the integration of new or modified Facilities to the reliability of the Transmission system. Oncor interprets and seeks consensus that the scope of such assessments is limited to steady-state, short-circuit, and dynamic studies as necessary. Additionally, the proposed FAC-002-1 R1.2 can be interpreted that the Transmission Planner and Reliability Coordinator performing the assessments would be responsible for ensuring that generation, transmission, and end-user entities seeking to connect to the Transmission system meet the stated reliability standards, planning criteria, and Facility connection requirements. However, the requirement needs to clarify that it is the responsibility of the entity seeking to interconnect to the Transmission system to ensure that it meets such reliability standards, planning criteria, and Facility connection requirements. Ultimately, it is the Transmission Planner’s and Reliability Coordinator’s responsibility to conduct the assessments in accordance with with applicable NERC Reliability Standards; regional, subregional, power pool, and Transmission Owner planning criteria; and Facility connection requirements.
Arizona Public Service Company	No Additional Comments
Exelon Companies	No additional. Thank you for the opportunity to comment.
City of Tallahassee	no other comments
Occidental Energy Ventures Corp.	OEV recommends more substance around the conditions where a Generator Owner looks to add a third party to the GO-TO interconnection. Whether done voluntarily or involuntarily (e.g.; at the behest of a RTO to relieve congestion), there are reliability and economic considerations which

Organization	Question 4 Comment
	must be addressed. We believe the economic factors by their nature automatically incorporate reliability concerns, and should prevail. As such, interconnection studies related to the new Facility additions would fall under business practices and tariffs - not the FAC standards.
Oklahoma Municipal Power Authority	Requirement R5 (previously R2) should be removed entirely as this is one of the Paragraph 81 requirements that was approved on 12/06/13 by FERC for retirement effective 01/21/2014.
Manitoba Hydro	The drafting team should reference the NERC IVGTF group 1.3 who reviewed the FAC-001 standard and made recommendations for changes. http://www.nerc.com/files/2012_IVGTF_Task_1-3.pdf The guidance document should likely be attached as an appendix so the Responsible Entity knows the minimum set of interconnection requirements that are to be documented. Are there plans to monitor compliance with the interconnection requirements in the revised standard?
NERC Standards Review Forum	The NSRF wishes to thank the Five Year Review Team and NERC in establishing a very thorough SAR. By including items such as; “reliability principles” within the SAR, the reader is presented with all the information required to accomplish a good review.
The United Illuminating Company	The Purpose of FAC-001 and FAC-002 should be changed from the idea of avoiding adverse impact to the idea of supporting reliable operation or providing a adequate level of reliability.
Pepco Holdings Inc. & Affiliates	The revisions are beneficial in simplifying requirements and adding clarity.
Duke Energy	Upon further review of the proposed revision to FAC-001, Duke Energy agrees with the FAC FYRT on the removal of Requirements 3.1.1 - 3.1.14, but our agreement is contingent upon these sub-requirements being moved into a guidance document.
Hydro One	We are in agreement with the proposed changes to the 2 standards and to NPCC RSC comments. It will provide clarifications of the requirements.
ACES Standards Collaborators	We have no additional comments and thank you for the opportunity to comment.

END OF REPORT