

Individual or group. (21 Responses)

Name (12 Responses)

Organization (12 Responses)

Group Name (9 Responses)

Lead Contact (9 Responses)

IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (0 Responses)

Comments (21 Responses)

Question 1 (19 Responses)

Question 1 Comments (21 Responses)

Question 2 (19 Responses)

Question 2 Comments (21 Responses)

Question 3 (16 Responses)

Question 3 Comments (21 Responses)

Question 4 (19 Responses)

Question 4 Comments (21 Responses)

Question 5 (0 Responses)

Question 5 Comments (21 Responses)

Individual
Tammy Porter
Oncor
Yes
Yes
Yes
Group
Northeast Power Coordinating Council
Guy Zito
Yes
This is a recently approved standard and is being included in the five year review so as to make the review by standards family complete. Affirmation is the appropriate approach.
No
The Facility Rating required by FAC-008 is purely a NERC compliance activity in many regions. The specificity in which the requirements are written precludes entities from using the actual ratings provided to their RC/PC/TP/TO/TOP as evidence in support of the requirements. For example, ISO-NE uses the NX-9 and NX-12 documents to gather the data necessary, while ERCOT used the RARF process. Neither of the processes provides the rating in a format that would be fully compliant with FAC-008-3. It is an unnecessary burden for entities to maintain multiple facility ratings. Additionally, auditors are aware of this discrepancy and generally request both ratings. The standard should be revised to either: • require all RC's to only request Facility Ratings which are developed in accordance with FAC-008 or • allow any Facility Rating that complies with an RC Facility Rating request be an acceptable method for compliance with FAC-008. Because of the prescriptive nature of FAC-008, a separate rating methodology and rating must be developed for compliance. Developing two separate ratings using two separate methodologies does not support the reliability of the BES. One rating for a facility, along with the appropriate documentation, should be sufficient.
Yes
Yes
The PDF of the standard refers to M7 and M8 on the bottom of page 5. There is an R7 and R8, but no corresponding M7 and M8. M5 and M6 reference R7 and R8. The Generator Owner shall keep evidence for Measure M7 for three calendar years... The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
Group
Arizona Public Service Company
Janet Smith

Yes
Individual
John Seelke
Public Service Enterprise Group
Yes
Individual
Nazra Gladu
Manitoba Hydro
Not Applicable.
Yes
Yes
Yes
(1) General Comment - replace "Board of Trustees" with "Board of Trustees" throughout the applicable documents/standards for consistency with other standards.
Group
Duke Energy
Colby Bellville
Yes
Yes
Yes
No
Duke Energy recommends an initial review of FAC-010-2.1, FAC-011-2, and FAC-014, by the FAC FRYT, to determine if a potential reliability gap would be created by delaying the review of these standards. In particular Duke Energy would like assurance that outage plans are assessed for their impact on reliability sufficiently ahead of time and when plans are modified. The TOP SDT team identified FAC-011 and FAC-014 as providing these type of assessments. When transmission and generation outage plans are made, assessments must be conducted to ensure reliability of the BES. These assessments should be conducted seasonally up to day ahead. It is no longer clear that the IRO, FAC and TOP standards act together to ensure proper assessments are performed. The Independent Experts Review Project identified Outage Coordination as a key area of concern where risk to BPS reliability was not adequately mitigated by the Reliability Standards.
Individual

David Thorne
Pepco Holdings Inc
Yes
Yes
Yes
Individual
Barbara Kedrowski
Wisconsin Electric Power
No
We appreciate the work of the FYRT in their review of these standards. However, we believe FAC-003-3 has a flaw which should be corrected at this opportunity. The requirement for a "clear line of sight" unnecessarily requires Generator Owners having very short generator interconnection leads to meet the vegetation management requirements designed for transmission circuits that have far greater exposure and risk. The applicability based on length of the circuit alone (greater than one mile) is entirely sufficient to assure that the BES is not at risk due to vegetation issues on generator interconnection leads. We wish to note that this also was the conclusion of the original GO-TO Task Force. The reliability risk of vegetation problems on overhead lines at the Generator-Transmission interface is almost zero. The requirement for Generator Owners to develop vegetation management programs for these short lines is counterproductive to reliability in that it will expend scarce resources for compliance that are better used for actual reliability improvements. Therefore, we urge the FYRT to recommend revisions to FAC-003-3 that will better utilize industry resources while still limiting risk of vegetation related outages.
Yes
Individual
Thomas Foltz
American Electric Power
Yes
Yes
Yes
Yes
Individual
Michael Falvo
Independent Electricity System Operator
Yes
Yes
Yes
Yes

Group
ACES Standards Collaborators
Ben Engelby
No
FAC-003-3 should not be affirmed because it is still pending FERC approval. We also disagree that FAC-003-2 should be affirmed in the event that FERC does not approve FAC-003-3. Based on the review team's logic of delaying FAC-010, -011, and -014 until FERC acts on the pending standards, why wouldn't the same reasoning apply to FAC-003-3? FAC-003-3 should not be affirmed; rather the review should be delayed until the Commission has issued a final order.
No
We recommend that FAC-008-3 be revised instead of affirmed. There are several modifications that could improve the standard. For instance, we suggest retiring R8 and rewriting R7 to read "Each TO and GO..." Also, there are several requirements (R1 part 1.1, part 1.2, and R2 sub-parts) that are more appropriate a technical guideline rather than a standard. FAC-008-3 has several requirements and sub-parts that could be clarified, retired under Paragraph 81, or moved to a technical guideline. The standard should be revised to address these issues.
No
FAC-013-2 could be combined with MOD-001 (TOP and TSP in operations horizon). If MOD -001, -028, -029 and -030 are retired, there may be a gap for the near term operating horizon and revising FAC-013-3 could address the gap for the near term planning horizon and the operational planning horizon. Also, there is a need to review the standard's use of "transfer capability" and "total transfer capability," as these seem to be redundant or difference is not clear. Finally, Requirements R1 parts 1.2 and 1.3, R2, R5, and R6 meet the Paragraph 81 criteria for retirement. Based on these reasons, we believe that FAC-013-2 should be revised and not affirmed.
Yes
It is proper to delay the review of standards that are pending FERC approval. We have included overlap issues that are associated with these standards when they are ripe for review.
There are other standards besides the TOP and TPL standards that overlap with FAC-011 and FAC-014. The standards project that is developing the VAR standards also overlaps with the FAC requirements. In particular, the proposed VAR-001-4 R1 is redundant with FAC-011-2 and FAC-014-2 and, thus, meets paragraph 81 criteria. FAC-014-2 R2 requires each TOP to establish SOLs for its transmission system that is consistent with the RC SOL methodology. FAC-011-2 R2 compels the RC to develop a SOL methodology that requires SOLs to consider voltage, thermal, and stability limits (including voltage) and demonstrate that the BES remains stable (transient, dynamic and voltage) during pre-contingent (R2.1) and post-contingent (R2.2) conditions. FAC-014-2 R6 compels the Planning Coordinator to identify which Category C (multiple) contingencies from TPL-003 that result in stability limits (including voltage) and to communicate the list of Category C (multiple) contingencies along with the stability limits to the RC. FAC-011-2 further compels the RC to establish a process for identifying which stability limits associated with multiple contingencies identified by the Planning Coordinator are applicable in the operating horizon within its SOL methodology. FAC-014-2 R5.2 compels the TOP to communicate its SOLs to its RC and TSP and FAC-014-2 R5.1 compels the RC to communicate the SOLs to neighboring RCs and other TOPs among a list of other entities. Finally, existing TOP-002-2.1b R10 and proposed TOP-002-3 R2 both require the TOP to operate within SOLs. Thus, the combination of FAC-011-2 and FAC-014-2 compel the establishment and communication of SOLs within the TOP footprint that already consider the items such as steady-state voltage limits and voltage stability limits compelled in proposed VAR-001-4 R1 and its subparts and TOP-002 compels the TOP to operate within those SOLs. These overlaps need to be reviewed and justify a recommendation for revising the FAC-011 and FAC-014.
Group
SPP Standards Review Group
Robert Rhoders
Yes
Even though it has been somewhat confusing in reading through the posted package and having to swap back and forth from one version of the standard to another.
Yes
Yes
Yes
Group
NERC Compliance Policy
Randi Heise
Yes

No
Dominion questions why team recommended removing many of the sub-requirements in FAC-001 as too prescriptive, yet left many of them in FAC-008-3 (such as 2.2.1-2.2-4 and 3.2.1-3.2.4). Dominion also suggests that R8 in its entirety, be removed as it is administrative in nature. Dominion recommends including the undefined term "terminal equipment" in R2.4.1 and R3.4.1 as a new definition in the Standard only, the NERC Glossary of Terms Used in Reliability Standards rather than including a definition in the FAC-008-3 RSAW. For reasons cited above, Dominion recommends REVISING this standard rather than RE-AFFIRMING. Dominion was unable to locate the clarification of the undefined term in RSAW_FAC-008-3_2013_v2. In addition, Dominion notes that the FAC-008-3 RSAW Version notation is identified as RSAW Version: RSAW_EOP-005-2_2013_v1 on the FAC-008-3 – Facility Ratings RSAW document cover page. Dominion suggests that NERC reviews CAN-0009 for its accuracy, as FAC-009-1 was inactive on 12/31/2012.
No
Dominion does not agree with recommendation to delay review of FAC-010-2.1, FAC-011-2, and FAC-014-2 until FERC acts on TOP-001-2—Transmission Operations, TOP-002-3—Operations Planning, and TOP-003-2—Operational Reliability Data. These purpose of these FAC standards is to insure that limits (including SOL and IROL) are established whereas the purpose of the cited TOP and TPL standards is to insure information is provided and plans in place to adhere to limits (including SOL and IROL).
Individual
Julaine Dyke
Northern Indiana Public Service Company
Yes
No
NIPSCO does not agree that clarification can be offered through a revised FAC-008-3 RSAW without also modifying the standard itself. The RSAW points back to and addresses each sub-requirement in the standard line by line. If an issue is not corrected in the standard, how is it possible for an RSAW to address ambiguities? There are inconsistencies between R2.1 and R2.2 and also between R3.1 and R3.2. R2.1 and R3.1 both state ("...at least one of the following...") and R2.2 and R3.2 both state ("...how each of the following were..."). NIPSCO suggests combining R2.1 and R2.2 and also R3.1 and R3.2 into one requirement, retaining the statement ("...at least one of the following..."), and eliminating the statement ("...how each of the following were..."). In doing this, R2.2.1, R2.2.2, R3.2.1 and R3.2.2 should be deleted and removed from the standard since they are already addressed in R2.1 and R3.1. This concept may be redundant (Criterion B7) per paragraph 81. Further clarification is requested on the requirements R1.1 versus R2.1/R3.1. Why is there an ambiguous difference in this verbiage? In R1.1, the first bullet point is a paraphrase of the first and second bullet points of R2.1/R3.1. R1.1 bullet point two seems to be a wordier restatement of R2.1/R3.1 bullet point three. What is intended by not stating these requirements with identical wording?
Yes
Yes
Individual
Andrew Gallo
City of Austin dba Austin Energy
Yes
Yes
Yes
Yes
Individual
Andrew Z. Pusztai
American Transmission Company, LLC
Yes

Yes
Yes
Yes
Group
Southern Company; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing
Pamela Hunter
Yes
Individual
Cheryl Moseley
Electric Reliability Council of Texas, Inc.
No
ERCOT is the Planning Coordinator for the ERCOT Region, which is the sole functional entity impacted by FAC-013. ERCOT is established as the ERCOT ISO pursuant to the Texas Public Utility Regulatory Act. Additionally, FAC-013-2 is related to the Modeling, Data, and Analysis ("MOD") Reliability Standards approved in FERC Order 729. In that Order, the Commission exempted ERCOT from the MOD standards because of the unique regional differences related to the ERCOT transmission system. The basis for the exemption in Order 729 applies to FAC-013-2 as well. Subjecting ERCOT to FAC-013 merely creates compliance obligations (and corresponding risk) with no reliability benefit. Order 729 exempted ERCOT from the MOD standards approved therein because the concepts did not apply in the ERCOT Region due to regional differences. FAC-013-2 applies those same concepts to the planning horizon. The ERCOT region does not have a transmission market and ERCOT manages congestion by employing a security constrained economic dispatch. ERCOT has no interchange with neighboring regions. The lack of a transmission market and congestion management via re-dispatch means that all available transmission capacity on the ERCOT grid is fully utilized, subject only to relevant reliability limits. Quantitative calculations related to transmission transfer capability in the ERCOT Region provides no value from a reliability or market perspective. Therefore, similar to the MOD standards, FAC-013 should not apply to ERCOT. FAC-013 should be revised to include an exemption in Section E. Regional Variances that exempts ERCOT. In the past, ERCOT's position has been supported by the NERC Regional Entity for the ERCOT Region, the Texas Reliability Entity ("Texas RE").
No
1. FAC-010-2.1 R2 is redundant with the TPL standards and should be removed. R2 and its sub-requirements have contingency performance requirements that are the same as Table 1 of the TPL standards. 2. The use of the term "Remedial Action Plans" in FAC-010-2.1 R3.4 is incorrect and should be removed. This is not a defined term. It may be referring to "Remedial Action Scheme" which is a defined term but is redundant with the term "Special Protection System" that is already used in R3.4. 3. FAC-014-2 R6 should be rewritten to consider the new TPL-001-4 standard and the multitude of contingencies that could result in a stability limit. Since TPL-003 will be retired upon implementation of TPL-001-4 the reference will be obsolete. Additionally, a revision should take into consideration that multiple types of P contingencies in the new Table 1 or even an extreme event may cause the creation of an SOL due to a stability limit – not just a Category C contingency as contemplated in the current standard.
Group
PacifiCorp
Kelly Cumiskey
Yes

Yes
Yes
Yes
Group
Bureau of Reclamation
Erika Doot
Yes
Reclamation believes that the ambiguous language related to 'terminal equipment' and facility ratings addressed in CANs should be corrected in the standard rather than in RSAWs.
Yes
Yes
Individual
Alice Ireland
Xcel Energy
Yes
No
We believe FAC-008-3 should be modified to address and clarify the applicability of requirements to dispersed generation. In its deliberations, the drafting team should consider the development of threshold criteria, as it would pertain to a dispersed generation facility.