

Comments on Second Posting of SAR and FAC-010-2, FAC-011-2, FAC-014-2 for Order 705

This SAR and associated standards were posted for a 30-day public comment period from March 31 through April 29, 2008. The drafting team asked stakeholders to provide feedback on the standard through a special Standard Comment Form. There were 13 sets of comments, including comments from more than 60 different people from more than 45 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

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, Gerry Adamski at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Process Manual:
<http://www.nerc.com/standards/newstandardsprocess.html>.

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Commenter	Company	Industry Segments									
		1	2	3	4	5	6	7	8	9	10
Anita Lee	AESO		x								
John Sullivan (G3)	Ameren	x									
Jason Shaver	ATC	x									
Chris Bradley (G2)	Big Rivers Electric Cooperative	x		x							
Brent Kinsford	CAISO		x								
Danny McDaniel (G4)	CLECO	x		x		x					
Ed Thompson (G1)	Consolidated Edison Co. of New York	x									
Michael Gildea (G1)	Constellation Energy							x			
Ron Hart (G1)	Dominion Resources, Inc.					x					
Jack Kerr (G2)	Dominion Virginia Power			x		x	x				
Louis Slade (G2)	Dominion Virginia Power										
Greg Rowland (G2)	Duke Energy - Carolinas	x		x							
Brian Berkstresser (G4)	Empire District Electric	x		x		x					
Ed Davis	Entergy	x									
Steve Myers	ERCOT										x
Dave Folk	FirstEnergy	x		x		x	x				
Doug Hohlbaugh	FirstEnergy	x		x		x	x				
Sam Ciccone	FirstEnergy	x		x		x	x				
Wayne Pourciau (G2)	Georgia System Operations Corp.	x		x							
Ross Kovacs (G2)	Georgia Transmission Corp.	x									
David Kiguel (G1) (I)	Hydro One Networks, Inc.	x									
Roger Champagne (G1)	Hydro-Quebec TransEnergie		x								
Sylvain Clermont (G1)	Hydro-Quebec Trans-Energie	x									
Ron Falsetti (G5) (G1)	Independent Electricity System Operator		x								
Kathleen Goodman (G1)	ISO - New England		x								
Matt Goldbery	ISO-NE		x								
Mike Gammon (G4)	Kansas City Power and Light	x		x		x					
Dan Jewell (G2)	Louisiana Generating, LLC	x		x	x						

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Commenter	Company	Industry Segments									
		1	2	3	4	5	6	7	8	9	10
	Authority										
Travis Sykes (G3)	Tennessee Valley Authority	x									
Walter Joly (G2)	Tennessee Valley Authority	x		x							x
Allen Klassen (G4)	Westar Energy	x		x		x					

Legend:

- G1 – NPCC Regional Standards Committee, RSC
- G2 – SERC OC Standards Review Group
- G3 - SERC EC Planning Standards Subcommittee
- G4 - SPP Operating Reliability Working Group
- G5 - IRC Standards Review Committee

I – indicates this person submitted individual comments in addition to the identified group comments

Question 1 – Several stakeholders indicated that the Assess Transmission Future Needs SDT working on revisions to the “TPL” series of standards has proposed a NERC definition of “Consequential Load Loss.” Because Order 705 did not direct NERC to include this footnote in FAC-010 and FAC-011, and because NERC has already made a commitment to modify the ATC-related standards to align with the TPL standards when they are revised, the drafting team has elected to remove the footnote from the revised standards. Do you agree with this change?

Entergy	No	We suggest the TPL series of standards and these FC standards should be properly aligned at the appropriate time.
NPCC RSC	Yes	This term is not in the Board of Trustee's approved versions so we are not clear on the basis of this change. In any event, we concur that references to this term, if any, should be removed pending outcome of the TPL standard development.
Northeast Utilities	Yes	This term is not in the Board of Trustee's approved versions so we are not clear on the basis of this change. In any event, we concur that references to this term, if any, should be removed pending outcome of the TPL standard development.
IESO	Yes	This term is not in the Board of Trustee's approved versions so we are not clear on the basis of this change. In any event, we concur that references to this term, if any, should be removed pending outcome of the TPL standard development.
IRS SRC	Yes	This term is not in the Board of Trustee's approved versions so we are not clear on the basis of this change. In any event, we concur that references to this term, if any, should be removed pending outcome of the TPL standard development.
SERC EC PSS	Yes	Please remove the reference to footnote in R2.3 in FAC-010 and 011.
FirstEnergy	Yes	The standards as proposed still show the superscript no. 2 for this removed footnote in R2.3.
OPPD	Yes	However, in both FAC-010 and FAC-011, the superscript "2" at the end of R2.3 needs to be removed.
ATC	Yes	ATC agrees with this decision.
Hydro One Networks, Inc.	Yes	
SERC OC SRG	Yes	

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SPP ORWG	Yes	
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Question 2 - Do you agree with the Violation Severity Levels proposed for FAC-010?

<p>NPCC Regional Standards Committee, RSC</p>	<p>No</p>	<p>R1: The progressive levels should not be dependent on which one of the 3 sub-requirements is violated since by doing so, the "impact" factor is included. In accordance with the VSL guideline, progressive VSLs should simply be dependent on how many or the percentage of those sub-requirements not met. For example, if the SOL Methodology missed one of the three, then the VSL is a Medium, 2/3 a High, and 3/3 a Severe.</p> <p>R2: Similar comments as in R1 but this one is a bit more complicated. We are unable to provide a simple example on the determination of the progressive violation level. Suggest the SDT to review and revise these levels, giving consideration to changing the sub-requirements that can better facilitate the development of VSLs.</p> <p>R3 to R5: Agreed. The approach taken for these requirements should be the basis for developing the VSLs for R1 and R2.</p>
<p>SERC OC Standards Review Group</p>	<p>No</p>	<p>The "Severe" Violation Severity Level for R3 overlaps the "High" Violation Severity Level. The word "three" should be replaced with "four" to prevent this overlap, i.e., The Planning Authority has a methodology for determining SOLs that is missing a description of "four" or more of the following: R3.1 through R3.6 Under the "Moderate" Violation Severity Level for R4 (first line), the word "or" should be changed to "of".</p>
<p>SERC EC Planning Standards Subcommittee</p>	<p>Yes</p>	<p>The VSL for R4 should read "One of the following."</p>
<p>SPP Operating Reliability Working Group</p>	<p>No</p>	<p>We find it difficult to determine which of the subrequirements is more critical than the other in R1. Therefore we suggest the SDT change the VSLs to something like the following: The Planning Authority has a documented SOL Methodology but is missing one of the subrequirements. This would be assigned the Lower category. Then, substitute two subrequirements for one and assign a Moderate category. Finally, substitute three subrequirements for one and assign a Higher category. We would suggest removing the first paragraph (above the 'or') in the Severe category.</p> <p>For R2, we suggest rewording the VSLs to make them similar to the VSLs for R3. As written, the VSLs imply that one of the subrequirements is more important than another. The Severe VSL for R3 should be changed to read 'four or more of the following:'</p> <p>The VSLs for R4 add an additional requirement to R4 by stipulating a specific time reference for the requirement. We would suggest eliminating the timing aspects and revise the VSLs to parallel what</p>

		<p>we proposed for the VSLs for R1.</p> <p>For R5, delete the phrase '?but less than 60 calendar days.' from the Lower VSL. We would suggest the following language for the Moderate category: 'The Planning Authority in their response did not include statements regarding changes or no changes to their SOL methodology.' Delete the first paragraph (above the 'or') of the VSL in the Higher category and keep the second paragraph (below the 'or'). Change the Severe category to the following: 'The Planning Authority failed to respond.'</p>
Northeast Utilities	No	<p>R1: The progressive levels should not be dependent on which one of the 3 sub-requirements is violated since by doing so, the "impact" factor is included. In accordance with the VSL guideline, progressive VSLs should simply be dependent on how many or the percentage of those sub-requirements not met. For example, if the SOL Methodology missed one of the three, then the VSL is a Medium, 2/3 a High, and 3/3 a Severe.</p> <p>R2: Similar comments as in R1 but this one is a bit more complicated. We are unable to provide a simple example on the determination of the progressive violation level. Suggest the SDT to review and revise these levels, giving consideration to changing the sub-requirements that can better facilitate the development of VSLs.R3 to R5: Agreed. The approach taken for these requirements should be the basis for developing the VSLs for R1 and R2.</p>
Ontario IESO	No	<p>R1: The progressive levels should not be dependent on which one of the 3 sub-requirements is violated since by doing so, the "impact" factor is included. In accordance with the VSL guideline, progressive VSLs should simply be dependent on how many or the percentage of those sub-requirements not met. For example, if the SOL Methodology missed one of the three, then the VSL is a Medium, 2/3 a High, and 3/3 a Severe.R2: Similar comments as in R1 but this one is a bit more complicated. We are unable to provide a simple example on the determination of the progressive violation level. Suggest the SDT to review and revise these levels, giving consideration to changing the sub-requirements that can better facilitate the development of VSLs.R3 to R5: Agreed. The approach taken for these requirements should be the basis for developing the VSLs for R1 and R2.</p>
IRC Standards Review Committee	No	<p>R1: The progressive levels should not be dependent on which one of the 3 sub-requirements is violated since by doing so, the "impact" factor is included. In accordance with the VSL criteria guideline document, progressive (graded) VSLs should be made dependent on how many or the percentage of the sub-requirements not met. For example, if the SOL Methodology missed one of the three, then the VSL is a Medium, 2/3 a High, and 3/3 a Severe, etc.R2: Similar comments as in R1 but this one is a bit more complicated. We are unable to provide a simple example on the</p>

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		determination of the progressive (graded) VSLs. We suggest the SDT to review and revise these levels, giving consideration to changing the sub-requirements that can better facilitate the development of VSLs.R3 to R5: We agree with these VSLs. The approach taken for these requirements should be the basis for developing the VSLs for R1 and R2.
Entergy	No	We suggest the removal of the term "outage" from FAC-010-2 R2.2.
Hydro One Networks, Inc.	No	<p>The VSLs for requirement R1 should weigh all violations of the 3 sub-requirements equally. For example, missing one of the three sub-requirements in the SOL methodology should result in a Medium VSL, missing two of three should result in a High VSL and missing all three should result in a Severe VSL and maintain having no SOL methodology as Severe.</p> <p>We agree with VSLs for requirements R2 and R3 however we find the VSL for R4 overly complex. We suggest HIGH: One of the following: (1)The Planning Authority failed to issue its SOL methodology and changes to that methodology to one of the required entities or (2) For a change in methodology, the changed methodology was issued after the effectiveness of the change but up to 30 calendar days after the effectiveness.</p> <p>SEVERE: One of the following: (1)The Planning Authority failed to issue its SOL Methodology and changes to that methodology to more than one of the required entities or (2) For a change in methodology, the changed methodology was issued 30 calendar days or more after the date of effectiveness of the change.</p>
ATC	No	<p>The ranking of the R1 levels should be lowered and the typographical error in R3 should be corrected.</p> <p>R1: Move omission of R1.2 (facility rating statement) from Moderate to Lower. Move omission of R1.3 (IROL description) from High to Moderate. Move omission of R1.1 (applicable to planning horizon SOLs) from Severe to High. Add omission of all three requirements to the Severe Level.</p> <p>R3: Correct typographical error in Severe Level text from "three or more" to "four or more"</p>
FirstEnergy	Yes	

Question 3 – Do you agree with the Violation Severity Levels proposed for FAC-011?

NPCC Regional Standards Committee, RSC	No	The structure of FAC-011 closely resembles that of FAC-010, hence, the same comments as in Q2 on R1 and R2, above apply (i.e. progressive versus impact factor). However, R3 is slightly different as it has 7 sub-requirements rather than 6 as in the case of FAC-010. Failing 1/7 is <25%, 2-3/7 < 50%, 4-5 <75% and 6-7 >75%. This would make a slight difference in the Medium, High and Severe levels. Please consider revising them. Mathematical methods can be applied to sub-requirements only if each sub-requirement is deemed to be of equal importance. If not, and the sub-requirements have different levels of importance, then some consideration should be given to the order in which they are employed in the mathematical formula.
Northeast Utilities	No	The structure of FAC-011 closely resembles that of FAC-010, hence, the same comments as in Q2 on R1 and R2, above apply (i.e. progressive versus impact factor). However, R3 is slightly different as it has 7 sub-requirements rather than 6 as in the case of FAC-010. Failing 1/7 is <25%, 2-3/7 < 50%, 4-5 <75% and 6-7 >75%. This would make a slight difference in the Medium, High and Severe levels. Please consider revising them. Mathematical methods can be applied to sub-requirements only if each sub-requirement is deemed to be of equal importance. If not, and the sub-requirements have different levels of importance, then some consideration should be given to the order in which they are employed in the mathematical formula.
Ontario IESO	No	The structure of FAC-011 closely resembles that of FAC-010, hence, the same comments as in Q2 on R1 and R2, above apply (i.e. progressive versus impact factor). However, R3 is slightly different as it has 7 sub-requirements rather than 6 as in the case of FAC-010. Failing 1/7 is <25%, 2-3/7 < 50%, 4-5 <75% and 6-7 >75%. This would make a slight difference in the Medium, High and Severe levels. Please consider revising them.
IRC Standards Review Committee	No	The structure of FAC-011 closely resembles that of FAC-010, hence, the same comments as in Q2 on R1 and R2, above apply (i.e. progressive (graded) versus impact factor). However, R3 is slightly different as it has 7 sub-requirements rather than 6 as in the case of FAC-010. Failing 1/7 is <25%, 2-3/7 < 50%, 4-5 <75% and 6-7 >75%. This would make a slight difference in the Medium, High and Severe levels. Please consider revising them.
SERC OC Standards Review Group	No	The headings for the Violation Severity Levels are missing from the table. Under the "Severe" Violation Severity Level for R2, the word "either" should be deleted from the sentence. Under the "Severe" Violation Severity Level for R4, the reference to "Planning Authority" should be replaced with "Reliability Coordinator".
SPP Operating Reliability Working	No	We again find it difficult to determine which of the subrequirements is more critical than the other in R1. Therefore we suggest the SDT change the VSLs to something like the following: The Reliability Coordinator has a documented SOL Methodology but is missing one of the subrequirements. This would be assigned the Lower category. Then, substitute two subrequirements for one and assign a

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Group		<p>Moderate category. Finally, substitute three subrequirements for one and assign a Higher category. We would suggest removing the first paragraph (above the 'or') in the Severe category. For R2, we suggest rewording the VSLs to make them similar to the VSLs for R3. As written, the VSLs imply that one of the subrequirements is more important than another. The Severe VSL should for R3 should be changed to read '?four or more of the following:'</p> <p>The VSLs for R4 add an additional requirement to R4 by stipulating a specific time reference for the requirement. We would suggest eliminating the timing aspects and revise the VSLs to parallel what we proposed for the VSLs for R1.</p> <p>Change the VSLs for R5 to match those we proposed in R5 of FAC-010 except replace Planning Authority with Reliability Coordinator</p>
Entergy	No	<p>Order 705 contains comments about removing the term "load greater than studied", or address FERC's concerns with the use of the term. It seems the term is still in the standard and we think FERC's concerns have not been addressed. Please remove the term or address FERC's concerns.</p>
Hydro One Networks, Inc.	No	<p>We agree with VSLs for requirements R1, R3 and R5 however we find the VSL for R4 overly complex.</p> <p>We suggest HIGH: One of the following: (1)The Reliability Coordinator failed to issue its SOL methodology and changes to that methodology to one of the required entities or (2) The Reliability Coordinator failed to issue its SOL methodology and changes to that methodology prior to the date of effectiveness but up to 2 days after the date of effectiveness. Here we suggest using 2 days as opposed to 30 days in FAC-010 because this is in the Operating Horizon and not the Planning Horizon. SEVERE: One of the following: (1)The Reliability Coordinator failed to issue its SOL Methodology and changes to that methodology to more than one of the required entities or (2) The Reliability Coordinator issued its SOL methodology and changes to that methodology 3 days or more after the date of effectiveness.</p> <p>As well, in the Severe VSL for R2, it is not clear the use of the word "either". We suggest deleting this word.</p>
ATC	No	<p>VSL's for R4</p> <p>FAC-011 requirement 4 specifies that the RC issue its SOL Methodology and changes to their methodology.</p> <p>Suggested Modification: Have only one VSL in the Moderate level that states the following:</p> <p>The RC did not issue its SOL Methodology or changes to its methodology to all required entities.</p> <p>We find our approach makes the VSLs for this requirement simpler to understand and determine.</p>

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		<p>VSL's for R5</p> <p>Requirement 5 specifies that the RC has to provide documented technical comments within 45 calendar days following receipt of comments.</p> <p>Suggested Modification: Have only one VSL in the lower level that states the following:</p> <p>The RC did not provide technical comments within 45 calendar days following receipt of comments.</p>
FirstEnergy	Yes	

Question 4 – Do you agree with the Violation Severity Levels proposed for FAC-014?

<p>NPCC Regional Standards Committee, RSC</p>	<p>No</p>	<p>(1) We applaud the SDT for developing progressive VSLs for R1 to R4. However, it may be very difficult for a responsible entity to report via the self-certification process absent any criteria or guideline on what 1-25%, 26-50% etc. of "inconsistency" with SOL methodology really means. This can become a dispute when the Compliance Monitor folks conduct a site audit as well. A suggestion is to establish a compliance guideline for use by the Compliance Auditor and make this guideline a/v to those required to self report on compliance. Alternatively (not preferred), the requirement is viewed as a binary type, i.e. either it is 100% consistent with the SOL methodology or be assigned a Severe VSL otherwise.</p> <p>(2) For R5, we agree with the VSLs that are based on the number of entities not provided the SOLs and the number of days missing the scheduled delivery, but we do not agree with tying the VSLs to which sub-requirements are not met (similar comments on R1 and R2 of FAC-010). Suggest the SDT to revisit this. A possible way to change this is to make VSLs progressive depending on the number of sub-requirements in R5.1 that are not met.</p> <p>(3) For R6, we see a main requirement and two mutually exclusive sub-requirements. The main requirement is the PC "identify" the subset of multiple contingencies associated with stability limits. After doing that, the PC shall provide this list to the RC. Where the PC does not have any of these identified (note that the wording in R6.2 could be misinterpreted as the PC does not go through the identification process at all), then it shall inform the RC that there is none identified. We would expect that not going through the identification process would constitute a complete violation of this requirement. Having gone through the identification exercise, failing to provide RC the list or failing to inform the RC that there are no such contingencies identified would constitute a lesser degree of violation since the PC has already met the requirement to go through the identification exercise. With this rationale, we'd expect a Low, Medium or High or even Severe for not meeting either R6.1 or 6.2, depending on the number of affected parties not provided the list or notified of none found, as opposed to determining the VSL based on which of R6.1 and R6.2 not met. In other words, R6.1 and R6.2 should be treated equally, and the level of violation would depend on the extent to which (i.e. the number of) RCs are not provided the list or informed. The Severe level assigned to not identifying the subset is proper, but it needs to have another component that's caused by a high number of RCs that did not receive a list (R6.1) or notification (R6.2).</p>
<p>SERC OC Standards Review Group</p>	<p>No</p>	<p>The language for identifying the ranges of inconsistency with the RC methodologies under each severity level for each of Requirements R1 - R4 is very confusing and misleading. There is no need to state that "there are SOLs"?. because this standard would not apply if there were none. We would suggest the following language for R1 VSLs and similar language for R2 - R4 VSLs: "Lower":</p>

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		<p>Up to 25% of the SOLs identified for the Reliability Coordinator Area are inconsistent with the Reliability Coordinator's SOL Methodology. (R1) "Moderate" 26 to 50% of the SOLs identified for the Reliability Coordinator Area are inconsistent with the Reliability Coordinator's SOL Methodology. (R1) "High": 51 to 75% of the SOLs identified for the Reliability Coordinator Area are inconsistent with the Reliability Coordinator's SOL Methodology. (R1) "Severe": More than 75% of the SOLs identified for the Reliability Coordinator Area are inconsistent with the Reliability Coordinator's SOL Methodology. (R1) For R3 and R4 under all VSLs, the "Planning Coordinator" should be changed to the "Planning Authority".</p> <p>Under R4 for the "High" VSL, "Reliability Coordinator" should be changed to "Planning Authority".</p>
SPP Operating Reliability Working Group	No	<p>The VSLs for R5 introduce a specific timing requirement that is not included in R5. This should be deleted. We find it difficult to determine which of the subrequirements is more critical than the other in R5. Therefore we suggest the SDT change the VSLs to something like the following: The responsible entity has communicated its SOL Methodology but is missing one of the subrequirements. This would be assigned the Lower category. Then, substitute two subrequirements for one and assign a Moderate category. Substitute three subrequirements for one and assign a Higher category. Finally, substitute four subrequirements for one and assign a Severe category. In R6 we suggest moving the Higher category VSL to the empty Moderate category. Move the second paragraph of the Severe category to the Higher category. Leave the first paragraph of the Severe category as the only entry for the Severe category.</p>
Northeast Utilities	No	<p>(1) We applaud the SDT for developing progressive VSLs for R1 to R4. However, it may be very difficult for a responsible entity to report via the self-certification process absent any criteria or guideline on what 1-25%, 26-50% etc. of "inconsistency" with SOL methodology really means. This can become a dispute when the Compliance Monitor folks conduct a site audit as well. A suggestion is to establish a compliance guideline for use by the Compliance Auditor and make this guideline a/v to those required to self report on compliance. Alternatively (not preferred), the requirement is viewed as a binary type, i.e. either it is 100% consistent with the SOL methodology or be assigned a Severe VSL otherwise.</p> <p>(2) For R5, we agree with the VSLs that are based on the number of entities not provided the SOLs and the number of days missing the scheduled delivery, but we do not agree with tying the VSLs to which sub-requirements are not met (similar comments on R1 and R2 of FAC-010). Suggest the SDT to revisit this. A possible way to change this is to make VSLs progressive depending on the number of sub-requirements in R5.1 that are not met.</p> <p>(3) For R6, we see a main requirement and two mutually exclusive sub-requirements. The main requirement is the PC "identify" the subset of multiple contingencies associated with stability limits. After doing that, the PC shall provide this list to the RC. Where the PC does not have any of these identified (note that the wording in R6.2 could be misinterpreted as the PC does not go through the</p>

		<p>identification process at all), then it shall inform the RC that there is none identified. We would expect that not going through the identification process would constitute a complete violation of this requirement. Having gone through the identification exercise, failing to provide RC the list or failing to inform the RC that there are no such contingencies identified would constitute a lesser degree of violation since the PC has already met the requirement to go through the identification exercise. With this rationale, we'd expect a Low, Medium or High or even Severe for not meeting either R6.1 or 6.2, depending on the number of affected parties not provided the list or notified of none found, as opposed to determining the VSL based on which of R6.1 and R6.2 not met. In other words, R6.1 and R6.2 should be treated equally, and the level of violation would depend on the extent to which (i.e. the number of) RCs are not provided the list or informed. The Severe level assigned to not identifying the subset is proper, but it needs to have another component that's caused by a high number of RCs that did not receive a list (R6.1) or notification (R6.2).</p>
Ontario IESO	No	<p>(1) We applaud the SDT for developing progressive VSLs for R1 to R4. However, it may be very difficult for a responsible entity to report via the self-certification process absent any criteria or guideline on what 1-25%, 26-50% etc. of "inconsistency" with SOL methodology really means. This can become a dispute when the Compliance Monitor folks conduct a site audit as well. A suggestion is to establish a compliance guideline for use by the Compliance Auditor and make this guideline a/v to those required to self report on compliance. Alternatively (nor preferred), the requirement is viewed as a binary type, i.e. either it is 100% consistent with the SOL methodology or be assigned a Severe VSL otherwise.</p> <p>(2) For R5, we agree with the VSLs that are based on the number of entities not provided the SOLs and the number of days missing the scheduled delivery, but we do not agree with tying the VSLs to which sub-requirements are not met (similar comments on R1 and R2 of FAC-010). Suggest the SDT to revisit this. A possible way to change this is to make VSLs progressive depending on the number of sub-requirements in R5.1 that are not met.</p> <p>(3) For R6, we see a main requirement and two mutually exclusive sub-requirements. The main requirement is the PC "identify" the subset of multiple contingencies associated with stability limits. After doing that, the PC shall provide this list to the RC. Where the PC does not have any of these identified (note that the wording in R6.2 could be misinterpreted as the PC does not go through the identification process at all), then it shall inform the RC that there is none identified. We would expect that not going through the identification process would constitute a complete violation of this requirement. Having gone through the identification exercise, failing to provide RC the list or failing to inform the RC that there are no such contingencies identified would constitute a lesser degree of violation since the PC has already met the requirement to go through the identification exercise. With this rationale, we'd expect a Low, Medium or High or even Severe for not meeting either R6.1 or 6.2, depending on the number of affected parties not provided the list or notified of none found,</p>

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		as opposed to determining the VSL based on which of R6.1 and R6.2 not met. In other words, R6.1 and R6.2 should be treated equally, and the level of violation would depend on the extent to which (i.e. the number of) RCs are not provided the list or informed. The Severe level assigned to not identifying the subset is proper, but it needs to have another component that's caused by a high number of RCs that did not receive a list (R6.1) or notification (R6.2).
IRC Standards Review Committee	No	<p>(1) We commend the SDT for developing progressive (graded) VSLs for R1 to R4. However, it may be very difficult for a responsible entity to report via the self-certification process absent any guideline on what 1-25%, 26-50% etc. of "inconsistency" with SOL methodology really means. This can become a dispute when the Compliance Monitor conducts a site audit as well. A suggestion is to establish a compliance guideline for use by the Compliance Auditor and make this guideline a/v to those required to self report compliance. Alternatively (not preferred), the requirement can be treated as a binary type, i.e. either it is 100% consistent with the SOL methodology or be assigned a Severe VSL otherwise.</p> <p>(2) For R5, we agree with the VSLs that are based on the number of entities not provided the SOLs and the number of days missing the scheduled delivery, but we do not agree with tying the VSLs to which of the sub-requirements are not met (similar comments on R1 and R2 of FAC-010). Suggest the SDT to revisit this. A possible way to change this is to make VSLs progressive depending on the number of sub-requirements in R5.1 that are not met.</p> <p>(3) For R6, we see a main requirement and two mutually exclusive sub-requirements. The main requirement is the PC "identify" the subset of multiple contingencies associated with stability limits. After doing that, the PC shall provide this list to the RC. Where the PC does not have any of these identified (note that the wording in R6.2 could be misinterpreted as the PC does not go through the identification process at all), then it shall inform the RC that there is none identified. We would expect that not going through the identification process would constitute a complete violation of this requirement. Having gone through the identification exercise, failing to provide RC the list or failing to inform the RC that there are no such contingencies identified would constitute a lesser degree of violation since the PC has already met the requirement to go through the identification exercise. With this rationale, we'd expect a Low, Medium or High or even Severe for not meeting either R6.1 or 6.2, depending on the number of affected parties not provided the list or notified of none found, as opposed to determining the VSL based on which of R6.1 and R6.2 not met. In other words, R6.1 and R6.2 should be treated equally, and the level of violation would depend on the extent to which (i.e. the number of) RCs are not provided the list or informed. The Severe level assigned to not identifying the subset is proper, but it needs to have another component that's caused by a high number of RCs that did not receive a list (R6.1) or notification (R6.2).</p>
Entergy	No	The Version History contains a note that "Cascading Outage" was changed to "Cascading". We suggest that note be removed since the change does not apply to this standard.

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FirstEnergy	No	<p>The following are potential issues with the VSL for FAC-014-1:</p> <ol style="list-style-type: none"> 1. R5 - The VSL do not address situations when the entities do not provide the subset of SOLs that are also considered potential IROLs. We suggest replacing the phrase "The responsible entity provided its SOLs" with "The responsible entity provided its SOLs (including the subset of SOLs that are IROLs) throughout the R5 VSLs where appropriate. 2. General - The main requirement number (ex. R5) does not need to be shown in parenthesis after the text of the VSL since the VSL table is arranged based on the main requirements. This is only useful if the VSL is geared toward a specific subrequirement (ex. R5.1).
HydroOne Networks	No	<p>For the VSLs for requirements R1, R2, R3 and R4 we suggest only High and Severe VSLs. Example, High: "There are SOLs for the Reliability Coordinator Area, but from 1% to 50% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology." Severe: "There are SOLs for the Reliability Coordinator Area, but more than 50% of these SOLs are inconsistent with the Reliability Coordinator's SOL Methodology." We suggest VSLs for R1, R2, R3 and R4 all follow the same pattern as the example provided.</p> <p>We find the VSLs for R5 to be well thought out but overly complex due to format of the requirement itself. We suggest breaking up the requirement into several requirements by isolating the responsible entity and their responsibilities.</p> <p>As well, for R6 we suggest a Severe VLS for violation of the "parent" requirement R6 and a High VSLs for violation of either sub-requirement R6.1 and R6.2. Example: HIGH: One of the following: The Planning Authority identified a list of multiple contingencies and associated stability limits, via studies, however the PA failed to provide these to the RC that monitors the facilities associated with those contingencies and limits.</p> <p>or (2) The Planning Authority, via studies, did not identify any stability-related multiple contingencies, however the PA failed to notify the RC of this outcome. SEVERE: The Planning Authority did not conduct studies to identify if a subset of multiple contingencies from the Standard TPL-003 result in stability limits.</p>
ATC	No	<p>VSL's for R5</p> <p>Requirement 5 specifies that the RC, PA and TP provide its SOLs to those entities that have a reliability-related need for those limits and provide a written request that includes a schedule for</p>

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		<p>delivery of those limits.</p> <p>Suggested Modification: Have only one VSL in the Moderate level that states the following:</p> <p>The RC, PA or TP did not provide its SOLs to those entities that have a reliability-related need for those limits per the schedule.</p>
SERC EC Planning Standards Subcommittee	Yes	

Question 5 – If you have any other comments on the revised SAR or standards that you haven’t already made in response to the first four questions, please provide them here.

NPCC Regional Standards Committee, RSC	(1) FAC-010: There is still a "Cascading outages" in R2.2, and a couple of places where the word "Outages" has been deleted but the letter "o" is still there. (2) FAC-011: A footnote 2 is referenced in R2.3 but we are unable to find it.
Northeast Utilities	(1) FAC-010: There is still a "Cascading outages" in R2.2, and a couple of places where the word "Outages" has been deleted but the letter "o" is still there. (2) FAC-011: A footnote 2 is referenced in R2.3 but we are unable to find it.
Ontario IESO	(1) FAC-010: There is still a "Cascading outages" in R2.2, and a couple of places where the word "Outages" has been deleted but the letter "o" is still there. (2) FAC-011: A footnote 2 is referenced in R2.3 but we are unable to find it.
IRC Standards Review Committee	(1) FAC-010: There is still a "Cascading outages" in R2.2, and a couple of places where the word "Outages" has been deleted but the letter "o" is still there. (2) FAC-011: A footnote 2 is referenced in R2.3 but we are unable to find it
Salt River Project	FAC-010-2 R2.2 and R2.5 use the capitalized word "Cascading". This appears to be a typo; perhaps "Cascading Outages" was intended or was "cascading" not meant to be capitalized? FAC-011-2 R2.2 uses the capitalized word "Cascading". This appears to be a typo; perhaps "Cascading Outages" was intended or was "cascading" not meant to be capitalized?
SERC OC Standards Review Group	None of the requirements in FAC-10, 011 or 014 have VRS or time horizons identified. In FAC-011, R 2.3.2, the following language that was previously removed has been reinserted - "e.g., load greater than studied" - and should be removed. In FAC-010, Requirement 2.2, the word "outages" should be deleted - it is not a part of the definition for "Cascading."
OPPD	In FAC-010, the word "outages" still needs to be removed from R2.2, and the letter "o" needs to be removed from E1.2.2 and E1.3.1.
SPP Operating Reliability Working Group	In FAC-010, R2.2 and R2.5 and FAC-011, R2.2 cascading outages should not be capitalized indicating it is a defined term. In FAC-010, R2.3 a reference is made to Footnote 2 but the footnote is missing. In FAC-011, R2.3 remove the Footnote 2 since the footnote itself has been deleted.
FirstEnergy	1. Since the ATFN SDT is in the process of consolidating TPL-001 through TPL-004, it may help to

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	<p>revise FAC-010 R2.5 & R2.6 and FAC-011 R6 to be more general and remove specific reference to TPL-003. We suggest replacing the phrase "Reliability Standard TPL-003" with "the TPL series of reliability standards".</p>
<p>HydroOne Networks, Inc.</p>	<p>We noticed some change control/editorial errors that may have been overlooked. They include: FAC-010-2: R2.2 remove the word "outage" completely. FAC-010-2: R2.3 remove the reference to the second footnote after the word "following" FAC-011-2: R2.3 remove the reference to the second footnote after the word "acceptable" FAC-011-2: R2.3.2 remove "e.g., load greater than studied" as stated in the Consideration for Comments for Version 1 of the SAR As well, Violatin Risk Factors and Time Horizons need to be established and reviewed for these standards.</p>
<p>ATC</p>	<p>Comments on the SAR:</p> <p>Issue 1: The SAR states that the phrase "i.e. load greater than studied" in FAC-011-1 R2.3.2 will be deleted but this was not shown in either the red-line or clean version of the standard.</p> <p>Is is still the intention of the SDT to removed this phase?</p> <p>Issue 2: NERC's BOT has already overturn their earlier approval for the term "Cascading Outage".</p> <p>The following Statement appears in NERC's Glossary of Terms:</p> <p>"On December 27, 2007, the FERC remanded the definition of "Cascading Outage" to NERC. On February 12, 2008, the NERC Board of Trustee withdrew its November 1, 2006 approval of that definition, without prejudice to the ongoing work of the FAC standards drafting team and the revised standards that are developed through the standards development process. Therefore, the definition is no longer in effect.</p>

	<p>With the NERC BOT withdraw of their prior approval and the FERC remand ATC does not believe that the SAR needs to address this definition. The only thing that the SAR must address is the term "Cascading Outage" is used in FAC-010, FAC-011 and FAC-014.</p> <p>Why does the SDT believe that they have to address a definition issue when both NERC BOT and FERC have not approve the definition?</p> <p>Question on what will be replacing the term "Cascading Outage":</p> <p>In FAC-010-1 Requirement 2.2 (redline version) the SDT is proposing to replace term "Cascading Outage" with the phrase "Cascading outage" but in requirement 2.5 the SDT is replacing it with only the term "Cascading".</p> <p>Is it the intention of the SDT to replace the term "Cascading Outages" with the phrase "Cascading outages" or only with the term "Cascading"?</p> <p>It's ATC's preference that the term "Cascading Outages" be replaced with the term "Cascading".</p>
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