Unofficial Comment Form

Project 2015-09 Establish and Communicate System Operating Limits

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project 2015-09 Establish and Communicate System Operating Limits** by **8 p.m. Eastern, August 26, 2020.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the project page [project page](http://nercdotcomstage/pa/Stand/Pages/Project-2015-09-Establish-and-Communicate-System-Operating-Limits.aspx). If you have questions, contact Senior Standards Developer, Latrice Harkness, (via email), or at 404-446-9728.

## Background Information

The Reliability Standards that address SOLs – FAC-010, FAC-011, and FAC-014 – have remained essentially unchanged since their initial versions. Since that time, many improvements have been made to the body of reliability standards, specifically those in the TPL, TOP, and IRO family of standards. The former TPL-001, -002, -003, and -004 Reliability Standards have been replaced with TPL-001-4, all of the TOP standards were replaced with the currently effective TOP-001, TOP-002, and TOP-003, and several IRO standards have been replaced as well. One of the primary objectives of Project 2015-09 is to make changes to the FAC standards to create better alignment with the currently effective TPL, TOP, and IRO standards and the revised definitions of Operational Planning Analysis (OPA) and Real-time Assessments (RTA).

Please provide your responses to the questions listed below along with any detailed comments.

## Questions

1. Industry response to the SDT’s second posting, and specifically the new FAC-011-4, Requirement 6, indicated numerous and significant concerns. Among the concerns were many industry commenters stating that SOL exceedances should be determined using the TOP and IRO standards and not an FAC standard. The SDT has responded by revising FAC-011-4, Requirement 6, removing FAC-014-3, Requirement 6, and adding TOP-001-6, Requirement R25 and IRO-008-3, Requirement R7 to have SOL exceedances determined by TOPs and RCs, respectively, per the RC’s SOL methodology and the performance framework now within FAC-011-4, Requirement R6. Do you agree with revisions made by the SDT in FAC-011-4, FAC-014-3, TOP-001-6 and IRO-008-3 with regard to SOL exceedance use and determinations?

[ ]  Yes

[ ]  No

Comments:

1. Industry response to the SDT’s second posting included many concerns regarding increased compliance and administrative logging from the SOL exceedance construct in FAC-011-4, Requirement 6. In response to these concerns, the SDT revised Requirement 6, added a new Requirement 7 to document a risk-based approach for determining how SOL exceedances are identified, and how they are communicated, including timeframes. The SDT also revised requirements and measures in TOP-001 (M14, R15, M15) and IRO-008 (R5, M5, R6, M6) to address this concern. Do you agree with revisions made by the SDT in FAC-011-4, TOP-001-6 and IRO-008-3 with regard to increased compliance risk and administrative logging?

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments regarding FAC-011-4 that you haven’t already provided, please provide them here.

Comments:

1. The SDT has received numerous comments on the new FAC-015-1 since the first posting. Acknowledging these comments, the SDT has withdrawn FAC-015-1 and consolidated its four requirements into three requirements (R6 – R8) in proposed FAC-014-3 that retain the minimum requirements the SDT believes will allow retirement of FAC-010 and maintain limit/criteria coordination between operations and planning. Do you agree with the proposed requirements R6 through R8 in FAC-014-3?

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments regarding FAC-014-3 that you haven’t already provided, please provide them here.

Comments:

1. If you have any other comments regarding TOP-001-6 or IRO-008-3 that you haven’t already provided, please provide them here.

Comments:

1. With the retirement of FAC-010, and the elimination of Planning-based SOLs and IROLs, do you agree with the changes to CIP-014, FAC-003, FAC-013, PRC-002, PRC-023 and PRC-026?

[ ]  Yes

[ ]  No

Comments: