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, December 7, 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](mailto:latrice.harkness@nerc.net), (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).

In order to maintain consistency with CIP-002 criteria language, the standard drafting team (SDT) will not be modifying CIP-014 during this project. The applicability language regarding the derivation of IROLs will not be changed in CIP-014. The SDT has made significant enhancements in the Facilities Design, Connections, and Maintenance (FAC), Transmission Operations (TOP) and Interconnection Reliability Operations (IRO) standards addressing issues with determining and communicating SOLs and Interconnection Reliability Operating Limits (IROLs). NERC is still evaluating approaches to the CIP-002 and CIP-014 language.

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

## Questions

1. Do you agree with the 24-month Implementation Plan?

Yes

No

Comments:

1. The SDT acted on industry comments and revised FAC-014-3 by adding requirement R5.6 and revising measure M3 and requirement R8. Do you agree with the revisions?

Yes

No

Comments:

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

Comments: