### **Unofficial Comment Form for Project 2010-10 — Modifications to FAC-012 and FAC-013 for Order 729 — Draft FAC-013-2 Standard**

Please **DO NOT** use this form. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=e90004c891d2475ea8f1f74a35d5e2ba) located at the link below to submit comments on the proposed SAR and modifications proposed FAC-013-2 — Planning Transfer Capability. Comments must be submitted by **November 3, 2010**. If you have questions please contact Darrel Richardson at [Darrel.richardson@nerc.net](mailto:Darrel.richardson@nerc.net) or by telephone at 609-613-1848.

<https://www.nerc.net/nercsurvey/Survey.aspx?s=e90004c891d2475ea8f1f74a35d5e2ba>

**Background Information:**

The SAR for Project 2010-10 – Modifications to FAC-012 and FAC-013 for Order 729 proposes modifications to the following standards:

* FAC-012-1 — Transfer Capability Methodology
* FAC-013-1 — Establish and Communicate Transfer Capabilities

In Order 729, FERC ruled that the ATC standards developed in Project 2006-07 did not completely address the topics covered in FAC-012 and -013 and did not fully address the associated directives from Order 693. Accordingly, FERC denied the portions of the implementation plan that would have retired these standards, and instead directed NERC to use the standards development process to make changes to the FAC standards and file those changes with FERC no later than 60 days prior to the effective date of the standards, which is April 1, 2011 (requiring the proposed changes to be filed on or before January 31, 2011).

NERC has an obligation to address FERC’s directives. It is the intent to identify all the applicable FERC directives and incorporate them in the draft standard. A second draft of the proposed standard has been developed that attempts to address the applicable FERC directives as well as address concerns raised by the industry during the first posting. Please review the proposed draft standard in its entirety and answer the following questions by using the electronic comment form.

**You do not have to answer all questions. Enter all comments in Simple Text Format.**

1. The SDT has modified the definition of Planning Transfer Capability (PTC). The definition now reads “The Transfer Capability that is calculated for the planning period beyond 13 months.” Do you agree that the revised definition provides additional clarity as to the time period for the calculations?

Yes

No

Comments:

1. The SDT has modified the definition of Planning Transfer Capability Implementation Document (PTCID) so that it is now called Planning Transfer Capability Methodology Document (PTCMD). The definition now reads “A document that describes the process for calculating Planning Transfer Capability (PTC).” Do you agree that the revised definition provides additional clarity as to the purpose of the document?

Yes

No

Comments:

1. The SDT has modified the Requirements to include data and modeling information as well as provide for additional clarity regarding the intent of the Requirement. Do you agree that the revised Requirements accomplish this goal?

Yes

No

Comments:

1. The SDT has modified the VRFs to better align with the risk associated with the Requirements. Do you agree that the VRFs are now more consistent with regards to the risk associated with the Requirements?

Yes

No

Comments:

1. The SDT has modified the Measures to better align with the Requirements. Do you agree that the Measures are now more consistent with the Requirements?

Yes

No

Comments:

1. The SDT has modified the VSLs to better align with the severity of non-compliance associated with the Requirements. Do you agree that the VSLs are now more consistent with regards to the severity of non-compliance associated with the Requirements?

Yes

No

Comments:

1. When reviewing the mapping document posted with the proposed FAC-013-2 standard, do you believe that the proposed standard (considering only the requirements assigned to the Planning Coordinator) will be lead to an improvement in reliability when compared to the standards it proposes to replace?

Yes

No

Comments:

1. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standard.

Comments: