

**Summary Consideration:** Based on the comments received with the re-ballot of FAC-010 and FAC-011, the drafting team made two minor changes to clarify intent of FAC-010:

- The definition of 'Contingency' was revised to replace the word, 'event' with 'failure or outage'.
- Level 4 non-compliance was revised to add a reference to the applicable requirement (...in accordance with FAC-010 R6 and R7.).

The Director-Standards ruled that the change in the definition is a significant change and the drafting team will re-post the definition for comment. No changes will be made to the content of either FAC-010 or FAC-011.

Company	Balloter	Ballot	Comments
Avista Corp. AVA	Scott James Kinney	Negative	The standard does not require the evaluation of credible multiple contingency events in determining SOLs. The requirement to study multiple contingency events needs to be added to the standard to meet the Northeast Blackout recommendations. Also, experience shows that multiple contingency events have resulted in significant system outages including area blackouts.
Avista Corp. Washington Water Power Division AVWP	Edward F. Groce	Negative	
<p><b>Response:</b> During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of <b>only</b> first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:</p> <ul style="list-style-type: none"> <li>- An enabler for regions to have credible multiple contingencies evaluated in the determination of system operating limits and for this list for contingencies to be less than the full set of Table 1 category C Contingencies. The list could have no entries or it could be as specific as detailing only certain contingencies at certain buses.</li> <li>- A reduction in the need for a series of regional differences to be embedded in the standard. Similarly, there is a reduced need for those responsible for establishing the methodology for the calculation of system operating limits or those responsible for the determination of limits to have to be aware of regional standards and to develop methodologies consistent with both the NERC and the regional standard.</li> <li>- An enabler for the regions to require different contingencies to be considered for planning and operating studies and for the criteria for evaluation of the contingencies to be different for each.</li> <li>- While not a direct factor, this wording reflects current reliability practice and ensures that it can continue.</li> </ul> <p>Note that there are no criteria for the establishment of SOLs used in the operating horizon, so developing a standard that does establish criteria is a step <b>forward</b>, not a reduction in reliability. The language in the proposed FAC-010-1 represents a compromise aimed at reaching the best consensus.</p>			

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Carolina Power & Light Company CPL	Verne Ingersoll II	Negative	<p>The definition of contingency has been modified and could be read to include the outage of multiple facilities as a single contingency. This is not consistent with industry practice for planning or operations.</p> <p>The responsible entities should be the Transmission Operator/Transmission Provider, they determine SOLs and in coordination with the RC determine IROLs. In the definition of transmission operator the functional model states "defines operating limits". The fact that some, but by no means all, Transmission Operators/Providers are also RCs may have confused this important issue.</p>
<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p> <p>This set of standards does not assume any particular corporate model. The RC and PA may delegate the development of this methodology to others. The RC and PA are required functions regardless of the organizational structure. The RC and PA can delegate the task of developing SOLs to the TOP and TP.</p>			
Con Edison Company of New York CEPD	vinod kotecha	Negative	Please see comments submitted by NYSRC and NPCC.
<p><b>Response:</b> Please see response to comments submitted by NYSRC and NPCC.</p>			
Dominion Virginia Power VAP	William Thompson	Negative	<p>Drafting team needs to make revisions to the definition of contingency. They have acknowledged the need in response to the first ballot comments, but the Standard cannot be changed until the vote is official.</p>
<p><b>Response:</b> The drafting team modified the definition of 'contingency' to clarify the intent. The word 'event' was replaced with 'failure or outage'. This will be posted for comment before the standard is balloted again.</p>			
Hydro One Networks Inc.	Ajay Garg Mark Penstone	Negative Negative	<p>Hydro One Networks votes negative in this standard due to concerns that have not been addressed and could have a significant impact in the Reliability of the BES. In the proposed standard, the imposition of multiple element "Category C" contingencies does not appear as a requirement in establishing SOLs. We believe that omission of such requirement can result in a serious deterioration of a reliable operation of the BES.</p> <p>In addition, we are concerned with the procedural action of separating the ballot of the three DFR standards. These standards originated in a single SAR, had one drafting team, were posted as one set and ballot body registration was for the package. The SAC must take steps to avoid similar unbundling in the future.</p>
<p><b>Response:</b> During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of <b>only</b> first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do</p>			

not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:

- An enabler for regions to have credible multiple contingencies evaluated in the determination of system operating limits and for this list for contingencies to be less than the full set of Table 1 category C Contingencies. The list could have no entries or it could be as specific as detailing only certain contingencies at certain buses.
- A reduction in the need for a series of regional differences to be embedded in the standard. Similarly, there is a reduced need for those responsible for establishing the methodology for the calculation of system operating limits or those responsible for the determination of limits to have to be aware of regional standards and to develop methodologies consistent with both the NERC and the regional standard.
- An enabler for the regions to require different contingencies to be considered for planning and operating studies and for the criteria for evaluation of the contingencies to be different for each.
- While not a direct factor, this wording reflects current reliability practice and ensures that it can continue.

Note that there are no criteria for the establishment of SOLs used in the operating horizon, so developing a standard that does establish criteria is a step **forward**, not a reduction in reliability. The language in the proposed FAC-010-1 represents a compromise aimed at reaching the best consensus.

Regarding the action of subdividing the standards into 3 separate ballots: As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc. The Standards Process Manual does not address this area, however as per the implementation plan there are no cross references between the standards that should preclude approving one set with or without the other sets of standards.

Hydro-Quebec HQT	MICHEL ARMSTRONG	Negative	The preballot posting appeared as one package of coordinated standards with associated implementation plan. The ballot shows this package has been split into three sets of two standards each and the industry hasn't been afforded the time to determine if the implementation plan is still valid or if there are no interrelationships of the standards that exist, making the individual sets valid if they passed and were stand alone.
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**Response:** As these standards were developed, they were reviewed on an individual basis so that balloters should already be familiar with the content and interdependencies. The reliability standards process is still a new process, and just because the Version 0 standards were balloted as a whole, this should not set a precedent that all sets of standards must be balloted as a whole. The drafting team does agree that if new standards have interdependencies, then those sets of interdependent standards should be balloted as a 'set' rather than individually. This is what the drafting team attempted to do in combining the ballot for FAC-008 with the ballot for FAC-009; and in combining the ballot for FAC-010 with that for FAC-011, etc.

JEA JEA	Ted E. Hobson	Negative	Present standard is ambiguous about double contingencies.
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**Response:** The drafting team assumes this is in reference to the definition of contingency. The drafting team has agreed to modify the definition was not intended to include multiple contingencies.

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Manitoba Hydro	Robert George Coish	Negative	MH supports NYSRC objections to FAC-010-1 as stated in their September 26, 2005 letter.
<b>Response:</b> Please see the response to the NYSRC comments.			
Nebraska Public Power District NPPD	Alan Boesch	Negative	By definition system operating limits are operating parameters. There is no such thing as a System Operating Limit in the planning horizon. TLP-001-0 thru TLP-005-0 addresses the requirements and actions during the planning period.
<b>Response:</b> SOLs are used in both the planning horizon and the operating horizon. A SOL can be developed for any condition – real or studied.			
New York Power Authority NYPA	Ralph Rufrano	Negative	NYPA has voted no has voted NO on proposed standards FAC-010-1 and FAC-011-1 because of the same concerns addressed by both NPCC and NYSRC.
<b>Response:</b> Please see response to comments submitted by NYSRC and NPCC.			
New York State Electric and Gas Corporation NYET	Henry G Masti	Negative	See comments of NYSRC
<b>Response:</b> Please see response to comments submitted by NYSRC.			
Northeast Utilities NU	roger c zaklukiewicz	Negative	NU provided comments on the initial ballot. NU was informed that it did not have to repeat its comments. NU continues to have concerns with the Standard as drafted and can not vote in the affirmative until those issues are resolved.
<i>Here are your comments from the previous ballot and the drafting team's response to those comments:</i>			
<p><b>Comment:</b> Category C contingencies are not addressed in the proposed System Operating Limits Standard thereby decreasing the overall reliability of the Bulk Electric System. Also, the proposed standard needs to clarify whether under certain specific emergency operating conditions some Category C contingencies could be exempted. As an example, if one of the Category C contingencies (loss of multiple circuits on a common transmission structure) does not have an inter-Area impact, can that contingency be exempted or must the Control Area always respect and operate to that and all other Category C contingencies irrespective of whether the contingency has or does not have inter-Area impact.</p> <p><b>Response:</b> The Version 0 TPL standards are for planning purposes and presume a pre-contingency condition of all facilities in service. In the operating horizon, there are almost always multiple outages including both planned and unplanned. Mixing the two pre-contingency conditions is not technically sound.</p>			
PP&L PAPL	Ray Mammarella	Negative	The standard does not contain adequate test for stability limits. Specifically, it does not contain the "most common type of fault, a single phase to ground fault, with a failure of a single primary relay or circuit breaker component, resulting in a stuck breaker." The standard(s) need to be revised to include "A single phase to ground fault with a failure of one protective component such as a stuck circuit breaker or failure of similar probability.
<b>Response:</b> The event you've described is a category C type event. During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies			

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<p>should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of <b>only</b> first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions.</p>			
<p>South Carolina Electric &amp; Gas Company SCEG</p>	<p>Lee N Xanthakos</p>	<p><b>Negative</b></p>	<p>The current draft standard requires the Reliability Coordinator to have a documented methodology for use in developing SOLs (SOL Methodology) within its Reliability Coordinator Area. SOLs are more local in nature and should be the responsibility of the Balancing Authority. The standard should be rewritten as follows: The Balancing Authority shall have a documented methodology for use in developing SOLs (SOL Methodology) within its Balancing Authority Area. This rewording should be carried forward throughout the standard.</p>
<p><b>Response:</b> Under the Functional Model, Balancing Authorities aren't required to have access to transmission data, therefore they couldn't be required to develop SOLs.</p>			
<p>Alberta Electric System Operator AESO</p>	<p>Anita Lee</p>	<p><b>Affirmative</b></p>	<p>In FAC-010-1, R5.3, it would be useful to provide clarification and examples on what should be included in the description on "Level of detail of system models used to determine SOLs". In section D, subsections 2 and 3, Level 4 non-compliance, a specific reference should be made to R6 and R7 in order to clearly identify who are the "required entities". We appreciate the provisions added to FAC-010-1 to reflect the more stringent requirements in the Western Interconnection. However, for the sake of reliability for all systems under NERC, we would encourage the Standards Drafting Team to consider modifying the requirements to include the consideration of credible multiple element contingencies in establishing System Operating Limits, for all Interconnections.</p>
<p><b>Response:</b> Response: Although we understand the concern with R5.3, an all inclusive list is not practical and a partial list is misleading so this was not changed.</p> <p>The drafting team will modify Level 4 as indicated.</p>			
<p>British Columbia Transmission Corporation</p>	<p>Phil Park</p>	<p><b>Affirmative</b></p>	<p>We commend the drafting team for their effort in recognizing the Western Interconnection requirements in this standard. We encourage other interconnections to consider these additional requirements in their operating limits.</p>
<p><b>Response:</b> Thank you for your support.</p>			
<p>FRCC</p>	<p>Linda Campbell</p>	<p><b>Negative</b></p>	<p>We do not agree with the new definition of contingency. It is much too broad. We prefer the current definition that is in the NERC glossary now.</p>
<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p>			

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Midwest Independent Transmission System Operator, Inc.	Terry Bilke	Affirmative	Please see our comments from the previous ballot.
<p><i>Here are your comments from the previous ballot and the drafting team's response to those comments:</i></p> <p><b>Comment:</b> While this standard is fine in concept, we're unclear why information has to be provided to the CM within 5 days (for data issues and on request). What value is added by imposing this?</p> <p><b>Response:</b> The proposed standards requires the information to be provided within 15 days (not 5 days) and is intended to provide a prompt response to a complaint.</p>			
New York State Reliability Council	Alan Adamson	Negative	<p>The New York State Reliability Council (NYSRC) has voted NO on proposed standards FAC-010-1 and FAC-011-1 because of the concerns addressed below. Our concerns specifically address standard FAC-010-1, "System Operating Limits Methodology". These concerns were expressed in our comments on previous drafts to the DFR standard drafting team (SDT), and continue not to be addressed in Draft #5 that has been balloted. The fundamental issue is our concern that the required methodology in the standard for determining System Operating Limits (SOLs) does not include a requirement to consider credible multiple element contingencies. Similar concerns have been expressed by the Northeast Power Coordinating Council (NPCC) and other entities. The NYSRC believes that the proposed standard is not consistent with a critical recommendation in the Final Report on the August 14, 2003 Blackout in the United States and Canada, prepared by the U.S.-Canada Power System Outage Task Force. Recommendation #25 states that the NERC process to reevaluate its standards should "not dilute the content of the existing standards." The report's support for this recommendation uses a quote from a commenter on the Interim Report as follows: "A strong transmission system designed and operated in accordance with weakened criteria would be disastrous. Instead, a concerted effort should be undertaken to determine if existing reliability criteria should be strengthened...Only through strong standards and careful engineering can unacceptable power failures like August 14, 2003 be avoided in the future." Standard FAC-010-1, because it does not require consideration of credible multiple element contingencies, does not meet this principle, for the following reasons:</p> <p>1. Section R2 of proposed standard FAC-010-1 states that the standard's required methodology "shall be applicable to development of SOLs during the planning horizon". However, the recently adopted Version 0 transmission system planning standard TPL-003-0, "System Performance</p>

		<p>Following Loss of Two or More BES Elements”, includes a requirement to assess so-called Category C contingencies, i.e., events resulting in the loss of two or more (multiple) elements. Therefore, adoption of FAC-010-1 in its present form, without considering Category C contingencies, would be inconsistent with Standard TPL-003-0 and would thus result in a weakening of existing NERC standards.</p> <p>2. Category C contingencies should be applied to the operation of the bulk electric system, as well as to planning. We are aware of the contention that in operations often there is a facility already out of service, and therefore consideration of multiple element contingencies, in addition, could be overly restrictive. We agree that there could be certain situations where consideration of Category C (multi-element) contingencies would result in unacceptable restrictions; however, if such a condition did arise an exception could always be requested.</p> <p>3. NYSRC agrees that Category C contingencies need not be applied when key transmission elements are already out of service. Traditionally, NPCC members and many other systems have used “normal operating criteria,” which include Category C contingencies, for determining SOLs when all key transmission elements are in service. When one or more key transmission elements are out of service, “emergency operating criteria,” which do not include Category C (multi-element) contingencies, would be used. Since the latter condition would normally apply for only a small percentage of the total hours of the year, Category C (multi-element) contingencies would and should be used for determining SOLs most of the time.</p> <p>4. Another reason for requiring Category C contingencies to apply to operations is that a system designed to these criteria should also be operated to it. It makes no sense to invest in and construct a transmission system based on Category C requirements in accordance with NERC transmission system planning standard TPL-003-0, and then operate the same system using weaker criteria as proposed in Standard FAC-010-1.</p> <p>5. We recognize that the SDT has included a provision in section R4.4 that allows a Region to establish criteria requiring consideration of credible multiple element contingencies. However, we believe that reliability standards recognizing this class of contingencies should be maintained in all of North America, not only certain Regions. A weakening of reliability standards in any Region could adversely affect the reliability in another</p>
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		<p>Region, even if the other Region has adopted more stringent standards. In conclusion, the NYSRC strongly believes that adoption of proposed standard FAC-010-1, as presently proposed, would weaken present NERC criteria, and in light of 2003 Blackout lessons-learned, would result in an unacceptable reliability impact for the North American bulk electric system. Note: These are the same comments that accompanied NYSRC's first vote on these standards. There was no information in the SDT's responses to these previous comments that convinced us to either change our earlier comments or our vote in this re-ballot.</p>
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**Response:**

During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of **only** first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:

- An enabler for regions to have credible multiple contingencies evaluated in the determination of system operating limits and for this list for contingencies to be less than the full set of Table 1 category C Contingencies. The list could have no entries or it could be as specific as detailing only certain contingencies at certain buses.
- A reduction in the need for a series of regional differences to be embedded in the standard. Similarly, there is a reduced need for those responsible for establishing the methodology for the calculation of system operating limits or those responsible for the determination of limits to have to be aware of regional standards and to develop methodologies consistent with both the NERC and the regional standard.
- An enabler for the regions to require different contingencies to be considered for planning and operating studies and for the criteria for evaluation of the contingencies to be different for each.
- While not a direct factor, this wording reflects current reliability practice and ensures that it can continue.

Note that **there are no criteria for the establishment of SOLs used in the operating horizon**, so developing a standard that does establish criteria is a step **forward**, not a reduction in reliability. The language in the proposed FAC-010-1 represents a compromise aimed at reaching the best consensus.

1. The Version 0 TPL standards are for planning purposes and presume a pre-contingency condition of all facilities in service. In the operating horizon, there are almost always multiple outages including both planned and unplanned. Mixing the two pre-contingency conditions is not technically sound.
2. The typical operating condition is to have one or more facilities out of service.
3. The typical operating condition is to have one or more facilities out of service.
4. An operating condition with all facilities in service would be so rare that it would be impractical to detect that condition and change the analysis process to accommodate this.
5. It is also clear that system reliability requires consideration of multiple contingencies in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions.

**There are no Version 0 standards with criteria for the establishment of SOLs used in the operating horizon**, so developing a standard that does establish criteria is a step **forward**, not a reduction in reliability.



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Northeast Power Coordinating Council	Edward Schwerdt	Negative	NPCC is on record, through its multiple comments during the drafting process, as opposing FAC-010-1 because it does not require consideration of credible multiple element contingencies (Category C) in the determination of System Operating Limits. The standard in its present form is inconsistent with TPL-003-0 and with recommendations in the 2003 Blackout Report.
<p><b>Response:</b> Response: The Version 0 TPL standards are for planning purposes and presume a pre-contingency condition of all facilities in service. In the operating horizon, there are almost always multiple outages including both planned and unplanned. Mixing the two pre-contingency conditions is not technically sound.</p>			
Western Electricity Coordinating Council	Louise McCarren	Affirmative	While the Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflect the more stringent requirements in the Western Interconnection, that for the good of the industry and the sake of reliability, Individual Regions and the Standards Drafting Team should consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits.
<p><b>Response:</b> During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of <b>only</b> first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:</p> <ul style="list-style-type: none"> <li>- An enabler for regions to have credible multiple contingencies evaluated in the determination of system operating limits and for this list for contingencies to be less than the full set of Table 1 category C Contingencies. The list could have no entries or it could be as specific as detailing only certain contingencies at certain buses.</li> <li>- A reduction in the need for a series of regional differences to be embedded in the standard. Similarly, there is a reduced need for those responsible for establishing the methodology for the calculation of system operating limits or those responsible for the determination of limits to have to be aware of regional standards and to develop methodologies consistent with both the NERC and the regional standard.</li> <li>- An enabler for the regions to require different contingencies to be considered for planning and operating studies and for the criteria for evaluation of the contingencies to be different for each.</li> <li>- While not a direct factor, this wording reflects current reliability practice and ensures that it can continue.</li> </ul> <p>Note that there are no criteria for the establishment of SOLs used in the operating horizon, so developing a standard that does establish criteria is a step <b>forward</b>, not a reduction in reliability. The language in the proposed FAC-010-1 represents a compromise aimed at reaching the best consensus.</p>			
Salt River Project SRP	Robert Kondziolka	Affirmative	An affirmative vote is cast in recognition that the standard incorporates the more stringent criteria of the western interconnection. The standards drafting team and other reliability regions should consider adoption of credible multiple element contingencies that are part of the western interconnection criteria in establishing System Operating Limits.
<p><b>Response:</b> During the development of this standard, the drafting team asked stakeholders to consider</p>			

whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of **only** first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:

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Clay Electric Cooperative	robert jefferson remley	Negative	disagree with the new definition of "contingency". Definition is too broad.....needs to be more specific.
<b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.			
Consumers Energy CETR Consumers Energy CETR	David Lapinski David Frank Ronk	Affirmative Affirmative	These standards should make system operating limits like SOLs (System Operating Limit) and IROLs (Interconnection Reliability Operating Limit) available to Distribution Providers and Load Serving Entities. The standards as currently rewritten only require that entities determining these limits (like Planning Authorities, Reliability Coordinators, and Transmission Planners) communicate this information to Planning Authorities, Reliability Coordinators, and Transmission Planners. If system conditions warrant shedding load or some other extreme measure, the Distribution Providers and Load Serving Entities should be made aware of system limits well ahead of time so that they can be aware of the risk to their customers' reliability.
<b>Response to both CETR comments:</b> This standard does not preclude the SOLs from being distributed to DPs and LSEs but does not require this distribution because the team doesn't believe the DPs and LSEs have a BES related need for the SOLs.			
Florida Power Corporation FPC Progress Energy - Carolinas	Lee G Schuster Wayne Lewis	Negative Negative	The definition of "contingency" has been changed from the current definition and could be read so as to include the loss of multiple elements for a single event. Applicability to the RC and RA assumes an RTO structure. Applicability needs to be revised to provide for applicability to Transmission Operators and Transmission Planners. These entities determine SOLs in non-RTO areas.

<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p> <p>This set of standards does not assume an RTO structure – these standards were written without the assumption of any particular corporate model. An RTO is a type of organization that may perform this function. The RC and PA may delegate the development of this methodology to others. The RC and PA are required functions regardless of the organizational structure. The RC and PA can delegate the task of developing SOLs to the TOP and TP.</p>			
JEA JEA	William Garry Baker	Negative	JEA is concerned with the contingency definition that includes multiple contingencies.
<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p>			
Manitoba Hydro MHEB	Ronald Dacombe	Negative	The specific issue is that proposed Standard FAC-010-1 would result in a weakening of existing Version 0 Standard TPL-003-0 with regard to consideration of credible multiple element contingencies (Category C contingencies). In both Planning and Operating studies Manitoba Hydro has adhered to the more stringent Standard TPL-003-0 specifically for developing MH-U.S. transfer capability and operating guides. This has generally been the practice for Northern MAPP studies.
<p><b>Response:</b> The Version 0 TPL standards are for planning purposes and presume a pre-contingency condition of all facilities in service. In the operating horizon, there are almost always multiple outages including both planned and unplanned. Mixing the two pre-contingency conditions is not technically sound.</p>			
MidAmerican Energy Company MEC	Thomas C. Mielnik	Affirmative	I fail to see the reliability benefit of requiring parties who post methodology to respond to comments within 45 days. I am voting yes in spite of my concern.
<p><b>Response:</b> The intent in setting a timeframe was to ensure that the timeframe was short enough that the comments would not linger without attention for too long, while also being long enough to provide the developer of the methodology an opportunity to research the validity of the comments.</p>			
Niagara Mohawk NMPC	Michael Schiavone	Negative	To ensure reliability, at a minimum Category C contingencies should be evaluated to determine which if any are credible multiple contingencies. Contingencies deemed credible should then be used in real time operations.
<p><b>Response:</b> During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of <b>only</b> first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:</p> <ul style="list-style-type: none"> <li>– An enabler for regions to have credible multiple contingencies evaluated in the determination of system operating limits and for this list for contingencies to be less than the full set of Table 1 category C Contingencies. The list could have no entries or it could be as specific as detailing only certain contingencies at certain buses.</li> <li>– A reduction in the need for a series of regional differences to be embedded in the standard. Similarly, there is a reduced need for those responsible for establishing the methodology for the calculation of system operating limits or those responsible for the determination of limits to have to be aware of regional standards and to develop methodologies consistent with both the NERC and the regional standard.</li> </ul>			

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<ul style="list-style-type: none"> <li>- An enabler for the regions to require different contingencies to be considered for planning and operating studies and for the criteria for evaluation of the contingencies to be different for each.</li> <li>- While not a direct factor, this wording reflects current reliability practice and ensures that it can continue.</li> </ul>			
Tampa Electric Company TEC	Ronald Donahey	Negative	The old definition of contingency is clearer than the proposed new definition of contingency. The new definition would appear to include any credible double contingency under the old definition.
<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p>			
Grant County PUD No.2 GCPD	Kevin John Conway	Negative	The Reliability Coordinators should limit data collection to the Transmission Operators and Balancing authorities ONLY. The information referred to in these standards is too deep. Each RC needs to get information from BAs and TOps. The BAs and TOps should be responsible for getting information from the other entities in their footprint as appropriate. This should satisfy data needs for both them, and the Reliability Coordinators.
<p><b>Response:</b> There is no data collection addressed in either FAC-010 or FAC-011.</p>			
Seminole Electric Cooperative SEC	Steven Wallace	Negative	The "contingency" definition is too broad and potentially modifies other standards.
<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p>			
City of Lakeland PLKT	Paul Elwing	Negative	The definition for "Contingency" is of particular concern and is a revision to what is already in the standard glossary. This new definition of contingency is much too broad and includes the loss of multiple elements by a single event
<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p>			
City of Tallahassee TAL	Alan Gale	Negative	The definition that has been proposed for "Contingency" causes me great concern. The definition will result in the "single Contingency" requirements being retroactively applied to any system event, regardless of how many elements are lost during that single initiating event. The "lightning strike" referred to in the response to Draft 3 comments could very easily take out 2 or 3 elements and cause any system to be in extremis. This will now be defined as a "single contingency", and we should be prepared for it? A CONTINGENCY should be the loss of any single element. An EVENT should be the loss of all elements associated with any single initiating cause. An EVENT may result in multiple CONTINGENCIES. This will prevent having to plan at "ludicrous speed" for a world of possible EVENTS that could take out more than one element.

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<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p>			
JEA JEA	Randy J. Boswell	Negative	JEA is concerned with the open definition of contingency that includes multiple outages.
<p><b>Response:</b> The drafting team did not intend this broad interpretation and therefore modified the definition to clarify the intent. The word 'event' was replaced with 'failure or outage'.</p>			
Tucson Electric Power Company TEPC	Michael Raezer	Affirmative	<p>While the Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflect the more stringent requirements in the Western Interconnection, that for the good of the industry and the sake of reliability, the Standards Drafting Team consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits.</p>
Sacramento Municipal Utility District SMUD	E. Nick Henery	Affirmative	
California Energy Commission	William Mitchell Chamberlain	Affirmative	
Platte River Power Authority TP PRPA	john collins	Affirmative	<p>While the Interconnection Wide Regional Differences identified in FAC-010-1 adequately reflect the more stringent requirements in the Western Interconnection, that for the good of the industry and the sake of reliability, the Individual Regions and the Standards Drafting Team should consider modifying the requirements of the NERC Standard to require the consideration of credible multiple element contingencies, similar to those identified in the Western Interconnection Wide Regional Differences, in establishing System Operating Limits.</p>
<p><b>Response to both comments above:</b> During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of <b>only</b> first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:</p> <ul style="list-style-type: none"> <li>- An enabler for regions to have credible multiple contingencies evaluated in the determination of system operating limits and for this list for contingencies to be less than the full set of Table 1 category C Contingencies. The list could have no entries or it could be as specific as detailing only certain contingencies at certain buses.</li> <li>- A reduction in the need for a series of regional differences to be embedded in the standard. Similarly, there is a reduced need for those responsible for establishing the methodology for the calculation of system operating limits or those responsible for the determination of limits to have to be aware of regional standards and to develop methodologies consistent with both the NERC and the regional standard.</li> <li>- An enabler for the regions to require different contingencies to be considered for planning and operating studies and for the criteria for evaluation of the contingencies to be different for each.</li> <li>- While not a direct factor, this wording reflects current reliability practice and ensures that it can continue.</li> </ul> <p>Note that there are no criteria for the establishment of SOLs used in the operating horizon, so developing a standard that does establish criteria is a step <b>forward</b>, not a reduction in reliability. The language in the proposed FAC-010-1 represents a compromise aimed at reaching the best consensus.</p>			

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United States Bureau of Reclamation	Deborah M. Linke	Affirmative	Consider modifying the requirements of FAC-010-1 to consider credible multiple element contingencies, similar to those identified in the Western Interconnecton Wide Regional Differences, in establishing System Operating Limits.
<p><b>Response:</b> During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of <b>only</b> first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:</p> <ul style="list-style-type: none"> <li>- An enabler for regions to have credible multiple contingencies evaluated in the determination of system operating limits and for this list for contingencies to be less that the full set of Table 1 category C Contingencies. The list could have no entries or it could be as specific as detailing only certain contingencies at certain buses.</li> <li>- A reduction in the need for a series of regional differences to be embedded in the standard. Similarly, there is a reduced need for those responsible for establishing the methodology for the calculation of system operating limits or those responsible for the determination of limits to have to be aware of regional standards and to develop methodologies consistent with both the NERC and the regional standard.</li> <li>- An enabler for the regions to require different contingencies to be considered for planning and operating studies and for the criteria for evaluation of the contingencies to be different for each.</li> <li>- While not a direct factor, this wording reflects current reliability practice and ensures that it can continue.</li> </ul> <p>Note that there are no criteria for the establishment of SOLs used in the operating horizon, so developing a standard that does establish criteria is a step <b>forward</b>, not a reduction in reliability. The language in the proposed FAC-010-1 represents a compromise aimed at reaching the best consensus.</p>			
Manitoba Hydro Electric Board MHEB	Daniel C Prowse	Negative	The proposed Standard FAC-010-1 would result in a weakening of existing Version 0 Standard TPL-003-0 with regard to consideration of credible multiple element contingencies (Category C contingencies)
<p><b>Response:</b> The Version 0 TPL standards are for planning purposes and presume a pre-contingency condition of all facilities in service. In the operating horizon, there are almost always multiple outages including both planned and unplanned. Mixing the two pre-contingency conditions is not technically sound.</p>			
National Association of Regulatory Utility Commissioners  New York State Public Service Commission  Public Service Commission of South Carolina	Diane Jean Barney  James T Gallagher  Philip D. Riley	Negative  Negative  Negative	The proposed standard falls short in ensuring a process to operate the system reliably by failing to adequately address multiple-outage contingencies and by allowing individual regions to operate to a lower standard from what is required in the planning process. The drafting team's reply on this issue does not change this fundamental failing.
<p><b>Response:</b> During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of <b>only</b> first contingencies. It is also clear that system reliability requires further considerations in some regions but these considerations do not form a consistent subset of contingencies categorized as level C considerations across all regions. The wording in the posted draft of the standard provides:</p> <ul style="list-style-type: none"> <li>- An enabler for regions to have credible multiple contingencies evaluated in the determination of</li> </ul>			

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- A reduction in the need for a series of regional differences to be embedded in the standard. Similarly, there is a reduced need for those responsible for establishing the methodology for the calculation of system operating limits or those responsible for the determination of limits to have to be aware of regional standards and to develop methodologies consistent with both the NERC and the regional standard.
- An enabler for the regions to require different contingencies to be considered for planning and operating studies and for the criteria for evaluation of the contingencies to be different for each.
- While not a direct factor, this wording reflects current reliability practice and ensures that it can continue.

Note that there are no criteria for the establishment of SOLs used in the operating horizon, so developing a standard that does establish criteria is a step **forward**, not a reduction in reliability. The language in the proposed FAC-010-1 represents a compromise aimed at reaching the best consensus.