Unofficial Comment Form
Project 2017-03 FAC-008-3 Periodic Review

Do not use this form for submitting comments. Use the electronic form to submit comments on the FAC-008-3 Periodic Review Team Preliminary Recommendation. The electronic form must be submitted by 8 p.m. Eastern, Wednesday, December 13, 2017.

Additional information about this project is available on the project page. If you have questions, contact Senior Standards Developer, Al McMeekin at (404) 446-9675.

Background Information
The Review Team completed a comprehensive review of FAC-008-3 – Facility Ratings. The team found the standard is sufficient to protect reliability and meets its reliability objectives; however, there may be future opportunity to improve minor clarity and consistency issues. The team seeks industry comment which will be used to make a final recommendation.
Questions

1. The Review Team identified a number of minor clarity and consistency issues within the standard and noted them in Attachment 4 of the FAC-008-3 Periodic Review Team Preliminary Recommendation; however, the team asserts the standard is sufficient to protect reliability and meets its reliability objectives. Do you agree? If not, please provide your comments and rationale. Note: If you provide comments regarding one of the team’s observations, please reference the particular observation.
   ☑ Yes
   ☐ No
   Comments:

2. The team did not identify a concern related to cost effectiveness as-drafted. Do you agree there are not any more cost effective alternatives to achieving the reliability objective(s) of the standard? If not, please provide an alternative approach with details on how it could be effectively implemented.
   ☐ Yes
   ☑ No
   Comments:


Better alignment on schedules for submitting facility ratings could reduce the number of administrative violations and make FAC-008 more cost effective.

FAC-008 is a commonly violated standard that is often the subject of auditor areas of concern and recommendations as referenced in the 2016 NERC CMEP Annual Report. We recommend that the FAC-008 standard be prioritized for revision.