Unofficial Comment Form for Project 2010-07—Generator Requirements at the Transmission Interface

Please **DO NOT** use this form to submit comments. Please use the electronic comment form located at the link below to submit comments on the first formal posting for Project 2010-07—Generator Requirements at the Transmission Interface. The electronic comment form must be completed by **July 17, 2011.**

[Project 2010-07—Generator Requirements at the Transmission Interface](#)

If you have questions please contact Mallory Huggins at mallory.huggins@nerc.net or 202-383-2629.

This is the first 30-day formal comment period for the standards included in Project 2010-07. A 30-day informal comment period took place earlier this year, from March 4 to April 4, 2011. The team thanks all those who provided feedback during that comment period. The team has reviewed and considered all comments submitted, and has incorporated many of them into its latest proposed standards, as explained in the [Summary Response to Informal Comment](#) posted at the Project 2010-07 project page.

The purpose of Project 2010-07 is to ensure that all generator-owned Facilities are appropriately covered under NERC’s Reliability Standards. While many Generator Owners and Generator Operators operate Elements and Facilities that are considered by some entities to be Transmission, these are most often radial Facilities that are not part of the integrated grid, and as such should not be subject to the same standards applicable to Transmission Owners and Transmission Operators who own and operate Transmission Elements and Facilities that are part of the integrated grid.

As part of the BES, generators affect the overall reliability of the BES. However, registering a Generator Owner or Generator Operator as a Transmission Owner or Transmission Operator, as has been the solution in some cases in the past, may decrease reliability by diverting the Generator Owner’s or Generator Operator’s resources from the operation of the equipment that actually produces electricity – the generation equipment itself.

The drafting team’s goal is to ensure that an adequate level of reliability is maintained in the BES by clearly describing which standards need to be applied to generator interconnection Facilities that are not already applicable to Generator Owners or Generator Operators. This can be accomplished by properly applying FAC-001 and FAC-003 to Generator Owners as proposed in the redline standards posted for comment.

Before reviewing the standards, the drafting team encourages all stakeholders to read the [background resource document](#) it has provided to describe its rationale and its work thus far.
You do not have to answer all questions. Enter all comments in Simple Text Format.

1. Do you support the proposed redline changes to FAC-001-1?
   - Yes
   - No
   Comments:

2. Do you support the one year compliance timeframe for Generator Owners as proposed in the Implementation Plan for FAC-001-1?
   - Yes
   - No
   Comments:

3. Taking into consideration that only one of the versions of FAC-003 will actually be implemented, a decision that will be made as the Project 2010-07 drafting team learns more about the status of Project 2007-07—Vegetation Management, do you support the proposed redline changes to FAC-003-X and FAC-003-3?
   - No
   Comments: See comments in the following questions.

4. The drafting team has added Generator Owners to the Applicability sections of FAC-003-X and FAC-003-3 with the qualifier that the included lines “extend greater than one half mile beyond the fenced area of the switchyard, generating station or generating substation up to the point of interconnection with the Transmission system.” The team received many comments about the need to define a distance rather than other measures for exclusion, and decided on the one half mile as a reasonable distance. Do you agree with this half-mile qualifier?
   - No
   Comments: The qualifier should be similar to that specified in Part 4.2.4 of FAC-003-3: “This standard applies to overhead transmission lines identified above (4.2.1 through 4.2.3) located outside the fenced area of the switchyard, station or substation and any portion of the span of the transmission line that is crossing the substation fence.” Vegetation needing attention can exist within a half mile of a switchyard. Vegetation does not discriminate between Generation and Transmission Owners.

5. Do you support the two year compliance timeframe for Generator Owners as included and explained in the Implementation Plans for FAC-003-X and FAC-003-3?
   - Yes
   - No
Comments:

6. In its background resource document, the drafting team lists the standards that it has not modified, and offers rationale for its decisions. Are there any reliability standards or requirements that you believe should apply to Generator Owners or Generator Operators that own and are responsible for the operation of an overhead Facility, that are not already applicable or have been proposed to be applicable (FAC-001 and FAC-003) by the Project 2010-07 drafting team? If so, please list them and offer an explanation as to why they should be applicable to that entity.

☐ Yes
☐ No

Comments:

7. Do you have any other questions or concerns with the proposed standards or with the background resource document that have not been addressed? If yes, please explain.

☒ Yes
☐ No

Comments: Regarding the Right-of-Way definitions, the definition in FAC-003-3 is the better of the two. Suggest adding “and maintain” to the first sentence of the definition as follows:

The corridor of land under a transmission line(s) needed to operate and maintain the line(s). The width of the corridor is established by engineering or construction standards as documented in either construction documents, pre-2007 vegetation maintenance records, or by the blowout standard in effect when the line was built. The ROW width in no case exceeds the applicable Transmission Owner’s or applicable Generator Owner’s legal rights but may be less based on the aforementioned criteria.

The term Right-of-Way goes beyond Transmission Vegetation Management, and that should be considered in the definition. How does Right-of-Way affect transmission facilities that are routed over bodies of water, or over valleys, highways, etc.? Right-of-Way in relation to underground facilities?

The format of FAC-003-X should be made consistent with current NERC guidelines (i.e.--Parts of Requirements should not have R’s in their numbering, should be 1.1, 1.2 etc.).