Unofficial Comment Form

Five-Year Review of FAC Standards: FAC-001-1 and FAC-002-1

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Five-Year Review Recommendations developed by the FAC Five-Year Review Team (FYRT). A draft Standard Authorization Request (SAR) for FAC-001-1 and FAC-002-1 that shows the scope of the recommended changes is also posted for information. The electronic comment form must be completed by 8:00 p.m. ET Monday, September 16, 2013.

If you have questions please contact Mallory Huggins (via email) or by telephone at 202-644-8062.

Five-Year Review of FAC Standards Project Page

Background Information

The FAC FYRT was appointed by the Standards Committee Executive Committee on April 22, 2013 as part of NERC’s obligation to conduct periodic reviews of its standards. While many of the standards in the FAC (Facilities Design, Connection, and Maintenance) family have been modified recently, the FAC FYRT reviewed all FAC standards as a group to identify opportunities for consolidation and additional improvements. The chart below summarizes the FYRT’s recommendations:

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<th>Reliability Standard</th>
<th>Title</th>
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<td>FAC-002-1</td>
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<td>Revise</td>
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<td>FAC-010-2.1</td>
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<td>FAC-013-2</td>
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<td>FAC-014-2</td>
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<td>FAC-501-WECC-1</td>
<td>Transmission Maintenance</td>
<td>N/A – will coordinate with WECC on Regional Entity-specific action</td>
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This comment form focuses on the standards that are recommended for revision; please see the comment form for FAC-003-3, FAC-008-3, FAC-010-2.1, FAC-011-2, FAC-013-2, and FAC-014-2 to provide feedback on the standards recommended for affirmation or delayed review. This comment form is soliciting feedback on the following documents:

1. Five-Year Review Recommendation to Revise FAC-001-1: Facility Connection Requirements
2. Five-Year Review Recommendation to Revise FAC-002-1: Coordination of Plans for New Facilities

A SAR Form proposing revisions to FAC-001-1 and FAC-002-1 has also been posted to provide additional information on the scope of the recommendations.

In sum, the FYRT recommends revising FAC-001-1 to retire a requirement (R4) that is redundant with obligations already captured in the Rules of Procedure, to remove subparts of a requirement (R3) that are too prescriptive for inclusion in a Reliability Standard, and to remove parts of the requirement (R1) that are redundant or have no impact on reliability. The VRFs should also be modified for conformance with NERC’s VRF guidelines. The FYRT recommends that FAC-002-1 be revised to make clear the responsibilities of the various entities to whom the Reliability Standard is applicable. R1 should also be revised to retire parts of the requirement that are redundant or have no impact on reliability.

When the comment period ends, the FYRT will review all comments received, finalize the recommendations and SAR accordingly, and present the recommendations to the Standards Committee for approval. If approved, the recommendations will be used to begin formal development for FAC-001-1 and FAC-002-1 and a standard drafting team will be formed.

**Questions**

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

1. Do you agree with the FYRT that despite the need for some revisions, FAC-001-1 is necessary for reliability?

   - [ ] Yes
   - [ ] No

   Comments: The provisions of FAC-001 besides being needed for reliability are also needed to implement regulatory obligations under other FERC dockets, specifically the FERC LGIA and SGIA obligations. It would be best to keep FAC-001 separate, rather than combine it with FAC-002.

2. Do you agree with the FYRT that despite the need for some revisions, FAC-002-1 is necessary for reliability?
☑ Yes
☐ No

Comments:
3. As explained in more detail in the *Five-Year Review Recommendation to Revise FAC-001-1*, the FYRT has proposed several revisions that a drafting team should consider in revising FAC-001-1:

- Revising the title and purpose of the Reliability Standard to reflect the language in the requirements.
- Retiring the following reference in R1: “...compliance with NERC Reliability Standards and applicable Regional Entity, subregional, Power Pool, and individual Transmission Owner planning criteria and Facility connection requirements” because it is redundant with FAC-002-1, R1.2 and built into the ERO framework established in Order 672.
- Retiring all of the subparts in R3, except for R3.1.1 and R3.1.2, and moving them to a guidance document.
- Modifying R3 to ensure that the impact on third parties is appropriately addressed.
- Retiring R4.
- Modifying the VRFs for conformance with NERC’s VRF guidelines.
- Adding Time Horizons to each requirement.

Do you agree with these proposed revisions? If not, please be specific in identifying the revisions you support and those you do not.

- [ ] Yes
- [x] No

Comments: We support all of the above revisions.

4. Are there any additional revisions to FAC-001-1 that you believe are necessary for reliability? If so, please explain those proposed revisions and explain why they are necessary (e.g., to properly apply Paragraph 81 criteria, for clarity, etc.).

- [ ] Yes
- [x] No

Comments: R3.1.2 may also be retired since with the recommended revision of FAC-002-1, it is now clear that Transmission Planner and Planning Coordinator have the main role in assessing the new facility connections and therefore “notification of new or modified Facilities to . . . those responsible for the reliability of the interconnected Transmission systems” is redundant.

Since FAC-001-1 is applicable only to Transmission Owner and Generator Owner, R3.1.1 could be interpreted as requiring these entities to conduct “joint studies” with the connection applicant. However, as per recommendations for revisions of FAC-002-1 (the above comment) these studies (which are
“similar kind of assessment to TPL”) will be conducted by TP and PC (with TO and GO cooperation). Therefore we suggest either combining FAC-001-1 and FAC-002-1 (as recommended in the SAR), or adding clarity for “coordinated joint studies” in R3.1.1.

FAC-001 - There may be overlap between FAC-001 and the currently posted VAR-001-1 Standard.

VAR-001 Requirement R4 - It appears that this requirement may already be covered by FAC-001-0 Requirement R2 (proposed FAC-001-1 R3).

FAC-001 Interconnection Agreement (IA) - NLTCs (no-load tap changers) are typically mechanically-fixed at time of generator interconnection and are only adjusted, if necessary, during a generator outage. The TOP establishes initial voltage and Real Power requirements in the IA under FAC-001. [The need for a NLTCs change, if any, is typically determined by the TOP through periodic, e.g., seasonal or 5-yr., system studies. NLTCs adjustment are determined by and directed by the TOP.]

FAC-001-0 R2 states:

R2. The Transmission Owner’s facility connection requirements shall address ...
   R2.1.9. Voltage, Reactive Power, and power factor control.

This matter is further complicated by a recommendation by the FAC Five-Year team to delete this section in the pending FAC-001-1 (R3). So, where should the requirement(s) be located?

There are two separate needs:
(a) to establish the initial interconnection voltage and Reactive Power interface requirements, i.e., NLTC settings from an IA voltage and Reactive Power requirement, e.g., responding to 1.0 p.u. +/-5%, and;
(b) the need for a periodic review of NLTC settings to account for system changes identified in periodic system studies, e.g., seasonal or 5-year reviews (VAR-001, R6).

Questions for consideration:
Is there a need to better coordinate the FAC-001 and VAR-001 standards to prevent overlaps and/or gaps? Where do (a) and (b) above belong in FAC-001, VAR-001 or elsewhere?

5. As explained in more detail in the Five-Year Review Recommendation to Revise FAC-002-1, the FYRT has proposed several revisions that a drafting team should consider in revising FAC-002-1:

- Revising the title and purpose of the Reliability Standard to reflect the language in the requirements.
- Changing “Planning Authority” in the applicability section to “Planning Coordinator” to reflect the Functional Model, as well as the recently revised TPL-001-4.
• Splitting R1 into three requirements to add clarity and better distinguish the actions required of the applicable entities. One requirement should describe the Transmission Planner and Planning Coordinators’ responsibility for conducting assessments. A second requirement should describe the Generator Owners’ responsibility for coordinating and cooperating with the Transmission Planner and Planning Coordinator as those assessments are conducted. A third requirement should describe the Transmission Owners’, Distribution Providers’, and Load-Serving Entities’ responsibility for coordinating and cooperating with the Transmission Planner and Planning Coordinator as those assessments are conducted.

• Revising the subparts of R1 to remove elements that are more appropriate for Measures.

• Modifying R1.1 to ensure that the impact on third parties is appropriately addressed.

• Modifying R1.4 to update the reference to the TPL Reliability Standards to reflect the changes in proposed TPL-001-4.

• Adding Time Horizons to each requirement.

Do you agree with these proposed revisions? If not, please be specific in identifying the revisions you support and those you do not.

☐ Yes  ☐ No

Comments:

6. Are there any additional revisions to FAC-002-1 that you believe are necessary for reliability? If so, please explain those proposed revisions and explain why they are necessary (e.g., to properly apply Paragraph 81 criteria, for clarity, etc.).

☐ Yes  ☐ No

Comments: We recommend revising R1.5 in FAC-002-1 to read “Documentation of the study assumptions and system performance requirements considered in the reliability impact assessments in R1.1 and the jointly coordinated conclusions and recommendations of the reliability impact assessments.” If the connection applicant proposes more than one alternative, all alternatives will be assessed and documented as per R1.1 and R1.5, otherwise, there will not be any “alternatives considered” to be documented.
7. If you have any other comments on the FAC Five-Year Review Recommendations that you have not already mentioned above, please provide them here:

Comments: Retiring R3.1 and R3.1.3 to R3.1.16 in FAC-001-1 will resolve the major flaw in this standard.

As mentioned above, FAC-001 and FAC-002 should not be combined.