Unofficial Comment Form


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). 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:

<table>
<thead>
<tr>
<th>Reliability Standard</th>
<th>Title</th>
<th>Five-Year Review Team Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>FAC-001-1</td>
<td>Facility Connection Requirements</td>
<td>Revise</td>
</tr>
<tr>
<td>FAC-002-1</td>
<td>Coordination of Plans for New Facilities</td>
<td>Revise</td>
</tr>
<tr>
<td>FAC-003-3</td>
<td>Transmission Vegetation Management Program</td>
<td>Affirm</td>
</tr>
<tr>
<td>FAC-008-3</td>
<td>Facility Ratings</td>
<td>Affirm</td>
</tr>
<tr>
<td>FAC-010-2.1</td>
<td>System Operating Limits Methodology for the Planning Horizon</td>
<td>Delay Review</td>
</tr>
<tr>
<td>FAC-011-2</td>
<td>System Operating Limits Methodology for the Operations Horizon</td>
<td>Delay Review</td>
</tr>
<tr>
<td>FAC-013-2</td>
<td>Assessment of Transfer Capability for the Near-term Transmission Planning Horizon</td>
<td>Affirm</td>
</tr>
<tr>
<td>FAC-014-2</td>
<td>Establish and Communicate System Operating Limits</td>
<td>Delay Review</td>
</tr>
<tr>
<td>FAC-501-WECC-1</td>
<td>Transmission Maintenance</td>
<td>N/A – will coordinate with WECC on Regional Entity-specific action</td>
</tr>
</tbody>
</table>
This comment form focuses on the standards that are recommended for affirmation or a delayed review; please see the comment form for recommendations for FAC-001-1 and FAC-002-1 to provide feedback on those two standards. This comment form is soliciting feedback on the following documents:

1. Five-Year Review Recommendation to Affirm FAC-003-3: Transmission Vegetation Management Program
2. Five-Year Review Recommendation to Affirm FAC-008-3: Facility Ratings

When the comment period ends, the FYRT will review all comments received, finalize the recommendations accordingly, and present them to the Standards Committee for approval. If approved for affirmation by stakeholders and the Standards Committee, the recommendations to affirm will then be presented to the NERC Board of Trustees for adoption. The delayed reviews will continue when FERC acts on the related TOP and TPL standards.

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. As explained in more detail in the Five-Year Review Recommendation to Affirm FAC-003-3, the FYRT believes that FAC-003-3 includes technically justified, clear requirements and recommends affirming it. Do you agree that FAC-003-3 should be affirmed? If not, please explain. (Note that if FERC does not approve FAC-003-3, this recommendation will apply to FAC-003-2.)

☐ Yes
☐ No

Comments: This is a recently approved standard and is being included in the five year review so as to make the review by standards family complete. Affirmation is the appropriate approach.
2. As explained in more detail in the *Five-Year Review Recommendation to Affirm FAC-008-3*, the FYRT believes that FAC-008-3 includes technically justified, clear requirements and recommends affirming it, with some clarifying modifications to the FAC-008-3 Reliability Standard Audit Worksheet. Do you agree that FAC-008-3 should be affirmed? If not, please explain.

☐ Yes
☒ No

Comments: The Facility Rating required by FAC-008 is purely a NERC compliance activity in many regions. The specificity in which the requirements are written precludes entities from using the actual ratings provided to their RC/PC/TP/TO/TOP as evidence in support of the requirements. For example, ISO-NE uses the NX-9 and NX-12 documents to gather the data necessary, while ERCOT used the RARF process. Neither of the processes provides the rating in a format that would be fully compliant with FAC-008-3. It is an unnecessary burden for entities to maintain multiple facility ratings.

Additionally, auditors are aware of this discrepancy and generally request both ratings.

The standard should be revised to either:
- require all RC’s to only request Facility Ratings which are developed in accordance with FAC-008 or
- allow any Facility Rating that complies with an RC Facility Rating request be an acceptable method for compliance with FAC-008.

Because of the prescriptive nature of FAC-008, a separate rating methodology and rating must be developed for compliance. Developing two separate ratings using two separate methodologies does not support the reliability of the BES. One rating for a facility, along with the appropriate documentation, should be sufficient.

3. As explained in more detail in the *Five-Year Review Recommendation to Affirm FAC-013-2*, the FYRT believes that FAC-013-2 includes technically justified, clear requirements and recommends affirming it. Do you agree that FAC-013-2 should be affirmed? If not, please explain.

☒ Yes
☐ No

Comments:

4. As explained in more detail in the *Five-Year Review Recommendation to Delay Review of FAC-010-2.1, FAC-011-2, and FAC-014-2*, the FYRT believes that all three standards require revision to add clarity and
remove redundancy with the newly revised TOP and TPL standards, but that a thorough review of these standards should be delayed until FERC acts on TOP-001-2, TOP-002-3, TOP-003-2, and TPL-001-4. Do you agree that review of FAC-010-2.1, FAC-011-2, and FAC-014-2 should be delayed? If not, please explain.

☐ Yes
☐ No

Comments:

5. 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: The PDF of the standard refers to M7 and M8 on the bottom of page 5. There is an R7 and R8, but no corresponding M7 and M8. M5 and M6 reference R7 and R8.

- The Generator Owner shall keep evidence for Measure M7 for three calendar years...
- The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.