Unofficial Comment Form
Project 2015-09 Establish and Communicate System Operating Limits Standards Authorization Request (SAR) 30-day informal comment period

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the draft SAR. The electronic comment form must be completed by 8:00 p.m. EST on **Monday, September 21, 2015**.

If you have questions please contact Lacey Ourso by [email](mailto:) or by telephone at 404-446-2581.

The 2015-09 Establish and Communicate System Operating Limits project page may be accessed by [clicking here](#).

**Background Information**
Facilities Design, Connections, and Maintenance (FAC) standards fulfill an important reliability objective for determining and communicating System Operating Limits (SOLs) used in the reliable planning and operation of the Bulk Electric System (BES). Project 2015-09 will revise requirements for determining and communicating these SOLs and address the issues identified in [Project 2015-03 Periodic Review of System Operating Limit Standards](#). Revisions are necessary to improve the requirements by eliminating overlap with approved Transmission Planning (TPL) requirements, enhancing consistency with Transmission Operations (TOP) and Interconnection Reliability Operations (IRO) standards, and addressing issues with determining and communicating SOLs and Interconnection Reliability Operating Limits (IROLs).

**Instructions for Commenting**
Please enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.
Questions

1. Do you agree with the proposed scope for Project 2015-09 as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.

☐ Yes
☒ No

Comments: Suggest a revision to the “Purpose” statement. Delete the words “planning and” from the statement because the focus of this SAR should be to cover the determination and communications of System Operating Limits (SOLs) in the Real-time operations time horizon.

2. If you have additional comments on this SAR that you have not provided in your above responses, please provide them here:

☐ Yes
☒ No

Comments: The SAR proposes to retire FAC-010-3 because BES planning is addressed in TPL-001-4. While both standards cover planning, TPL-001-4 does not specifically address SOLs.

Because the severity of facility ratings are time dependent, a definition for operations time horizon needs to be developed. Suggest Operations Time Horizon be defined as the time period it takes to ensure stable system operation following a Real-time Assessment. Specifics can be incorporated in the standard.

On page 3, suggest revising the sentence “Develop revised or new requirement(s) that facilitate transfer of necessary reliability information between the planning and operating entities for establishing and communicating System Operating Limit.” Please substitute the word “planning” with “owning entities.” Also, please add a clarification, “(i.e., from the TOs, DPs, and GOs to the TOPs).” The revised sentence would then read as follows:
“Develop revised or new requirement(s) that facilitate transfer of necessary reliability information between the owning entities and the operating entities (i.e., from TOs, DPs and GOs to the TOPs) for establishing and communicating System Operating Limits.”
Operating entities should not go to the planning entity for the basic system descriptive information, such as feeder and equipment ratings. Operating entities should go back to the original responsible source of this information, i.e., the asset owning entity (TO or GO).