Unofficial Comment Form
Generator Requirements at the Transmission Interface (Project 2010-07)

Please DO NOT use this form to submit comments. Please use the electronic comment form 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 April 09, 2012.

2010-07 Project Page

If you have questions please contact Mallory Huggins at mallory.huggins@nerc.net or 202-644-8062.

Background
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.

On January 20, 2012, Exelon submitted a Level One Appeal of the standard process for FAC-003-3 and FAC-003-X to NERC’s Vice President of Standards and Training that stated the following: “Exelon believes that the NERC Standards Process Manual was not followed, and that based on the substantive changes made to both Standards following the Initial Ballot, NERC should have set the Standards for vote using a Successive Ballot rather than a Recirculation Ballot.”

NERC’s Vice President of Standards and Training submitted a timely response to the appeal that found that “Exelon...made its case that the [Standard Processes Manual] was not adhered to and that a change impacting applicability was made between the last successive and recirculation ballot.” Accordingly, the Vice President of Standards and Training referred the issue to the Standards Committee for handling, suggesting the following options:
1. Re-post the standard for a successive ballot and recirculation ballot. Essentially set the clock back and correctly replay the last steps of the process.
2. Ask the SDT to remove the clarification language from the final standard and go directly to recirculation ballot.
3. Ask the SDT to redesign the challenged portion of the proposed standard.

He recommended that the Standards Committee pursue option 2. In a Standards Committee Executive Committee (SCEC) conference call on February 23, 2012, the SCEC directed NERC staff to void the FAC-003-3 and FAC-003-X recirculation ballot results of December 2011 and “remand the work to the drafting team with direction to take into account the issues raised in the Exelon appeal submitted in response to the recirculation ballot previously conducted and either: modify the language added following the initial ballot and then re-post the standard for a successive ballot, or remove the language added following the initial ballot and go directly to recirculation ballot.”

The Project 2010-07 SDT considered Exelon’s appeal in the context of other stakeholder comments submitted in the first successive ballot between October 5 and November 18, 2011. The SDT continues to believe that a reference to line of sight is clarifying and makes explicit the SDT’s implicit intent from day one. Thus, it kept the line of sight reference but made a few additional changes for formatting clarity and language consistency. The team also added a footnote to further explain what it means by “line of sight.”

Additionally, “Regional Entity” was removed from the Applicability section of FAC-003-X because it is not a Functional Entity according to the Functional Model.

The FAC-003-3 and FAC-003-X recirculation ballot results of December 2011 have been voided, and both standards are being posted for a 30-day concurrent comment period and successive ballot to allow stakeholders the opportunity to comment on these changes.

The appeal and NERC response are posted on the [2010-07 project page](#).

Status of other standards that are part of Project 2010-07:

- FAC-001-1 and PRC-004-2.1a were adopted by NERC’s Board of Trustees on February 9, 2012
- PRC-005-1.1a is currently posted for a 45-day concurrent comment and initial ballot.

No standards modified under Project 2010-07 will be filed with regulatory authorities until the Board of Trustees has acted on the complete package of four standards.
You do not have to answer all questions. Enter all comments in Simple Text Format.

1. The Project 2010-07 SDT considered Exelon’s appeal in the context of other stakeholder comments submitted in the first successive ballot between October 5 and November 18, 2011, along with advice from NERC staff. The SDT continues to believe that a reference to line of sight is clarifying and makes explicit the SDT’s implicit intent from day one. Thus, it kept the line of sight reference but made a few additional changes for formatting clarity and language consistency. The team also added a footnote to further explain what it means by “line of sight.” Do you agree with these changes? If not, please provide specific alternative language.

☐ Yes
☒ No

Comments: The Applicability language used in FAC-003-X is different from that used in FAC-003-3. The language used in FAC-003-X uses “and” in several places which leads to confusion and a probable “null” result, whereas the language in FAC-003-3 is more straightforward and makes use of “or”. The FAC-003-3 applicability language should be used in FAC-003-X.

The explanation of what is meant by line of sight should be incorporated in the Applicability Section wording as standards, at NERC’s direction, are supposed to be getting away from the use of footnotes.