

**From:** [Guy V. Zito](#)  
**To:** [rsballot](#)  
**Cc:** [rsc](#); [rscmembers](#)  
**Subject:** NERC Ballot-Project 2015-09 Establish and Communicate System Operating Limits  
**Date:** Friday, July 24, 2020 8:56:28 AM  
**Importance:** High

---

NPCC Members and Entities of the NERC Registered Ballot Body,

**The subject project is currently posted for an Additional Ballot until 8 pm August 3<sup>rd</sup>, 2020.** The NERC project page may be found here:

<https://www.nerc.com/pa/Stand/Pages/Project-2015-09-Establish-and-Communicate-System-Operating-Limits.aspx>

The main changes are in the following standards three standards along with a proposed retirement of the existing FAC-010-3 (mapping may be found on the project page).

FAC-011-4 – System Operating Limits Methodology for the Operations Horizon

FAC-013-3 – Assessment of Transfer Capability for the Near-term Transmission Planning Horizon

FAC-014-3 – Establish and Communicate System Operating Limit

There were conforming changes made to the following, primarily to remove the IROL references identified in a planning time horizon, for the following standards.

CIP-014-3 – Physical Security

FAC-003-5 – Transmission Vegetation Management

PRC-002-3 – Disturbance Monitoring and Reporting Requirements

PRC-023-5 – Transmission Relay Loadability

PRC-026-2 – Relay Performance During Stable Power Swings

TOP-001-6 – Transmission Operations

IRO-008-3 – Reliability Coordinator Operational Analyses and Real-time Assessments

There was a detailed Webinar held last week to describe the changes and the SDT's position. Slides may be found at : [Slide Presentation](#) and a recording of the Webinar may be found at : [Recording](#)

Comments from the last posting and ballot were considered and revisions made in the posted versions. Also, the Implementation Plan is posted.

The NPCC Regional Standards Committee ("RSC") has reviewed the posted materials and discussed the project with the members of the Standard Drafting Team. The RSC has not received a full consensus on a voting position. The minority opinion of the RSC has the following concerns and is considering casting a negative vote:

- The 12 calendar month implementation plan may be too short considering additional tracking, validation, and documentation of exceedances will be necessary. Enhancements to existing tracking tools may be required.

The revision of CIP-014 applicability section 4.4.1.3 will be inconsistent with CIP-002 Attachment 1 – Impact Rating Criteria 2.6. This could lead to uncertainty regarding applicability and impact ratings. CIP-014 and CIP-002 should be revised at the same time.

**NPCC, as the Regional Entity, believes the revisions made support the reliable operation of the BES so will be casting an Affirmative Vote(s) at this time and cast a positive opinion in the non-binding poll.** Please let me know if you have other questions or concerns.

Thanks,

Guy V. Zito  
Chair NPCC Regional Standards Committee