

Comment Form for Project 2010-10 — Modifications to FAC-012 and FAC-013 for Order 729 — Draft FAC-013-2 Standard

Please **DO NOT** use this form. Please use the [electronic comment form](#) located at the link below to submit comments on the proposed SAR and modifications proposed FAC-013-2 — Planning Transfer Capability. Comments must be submitted by **January 8, 2011**. If you have questions please contact Darrel Richardson at Darrel.richardson@nerc.net or by telephone at 609-613-1848.

http://www.nerc.com/filez/standards/Project2010-10_FAC_Order_729.html

Background Information:

The SAR for Project 2010-10 – Modifications to FAC-012 and FAC-013 for Order 729 proposes modifications to the following standards:

- FAC-012-1 — Transfer Capability Methodology
- FAC-013-1 — Establish and Communicate Transfer Capabilities

In Order 729, FERC ruled that the ATC standards developed in Project 2006-07 did not completely address the topics covered in FAC-012 and -013 and did not fully address the associated directives from Order 693. Accordingly, FERC denied the portions of the implementation plan that would have retired these standards, and instead directed NERC to use the standards development process to make changes to the FAC standards and file those changes with FERC no later than 60 days prior to the effective date of the standards, which is currently believed to be on or after April 1, 2011 (requiring the proposed changes to be filed on or before January 28, 2011).

NERC has an obligation to address FERC's directives. It was the intent to identify all the applicable FERC directives and incorporate them in the draft standard. A second draft of the proposed standard has been developed that attempts to address the applicable FERC directives as-well-as address concerns raised by the industry during the first posting. Please review the proposed draft standard in its entirety and answer the following questions by using the electronic comment form.

You do not have to answer all questions. Enter all comments in Simple Text Format.

1. The SDT has defined the term Near-Term Transmission Planning Horizon. The definition reads “The transmission planning period that covers year’s one through five.” (This definition was originally developed by the Assess Transmission Future Needs SDT and has been moved to this project as this project will be completed before the Assess Transmission Future Needs project.) Do you agree that this term provides clarity as to the period the standard applies?

Yes

No

Comments:

The definition is not clear as to when year one starts. Suggest rewording to: “The transmission planning period that covers the period of 12 to 60 months from the date of the assessment.”

2. The SDT has modified the Purpose statement. The Purpose statement now reads “To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of the ability to transfer energy (in the Near-Term Transmission Planning Horizon) to identify potential future weaknesses and limiting Facilities that could impact the reliability of the Bulk Electric System (BES).” Do you agree that the revised Purpose statement provides greater clarity as to what the standard is intended to accomplish?

Yes

No

Comments: The statement adds clarity; however the revised standard does not serve this purpose. Knowing the transfer limit does not assess the reliability of the BES. The Transmission Planning Standards (TPL) are the standards which will determine BES reliability by demonstrating a system’s ability to serve load through the capability of the transmission system and internal resources.

3. The SDT has added a Requirement R6. The Requirement R6 reads “If a recipient of a documented Transfer Capability assessment requests data to support the assessment, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request.” Do you agree that the Requirement is necessary for verification of the assessment?

Yes

No

Comments: This requirement states that the Planning Coordinator provide the data to support the assessment results upon request. Such entities may be restricted from receiving such data as it may be CEII, market sensitive data, or violate other Planning Coordinator policies.

4. The SDT has modified the VSLs to better align with the Requirements. Do you agree that the revised VSLs are now appropriately aligned with the Requirements?

Yes

No

Comments:

5. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standard.

Comments:

R1.1 – This requirement is unclear as written. Using the term “transfers” suggests that the values are known at the initiation of the study. “Transfers” be replaced with “interfaces” to become “Criteria for the selection of the interfaces to be assessed.”

R1.2 - The intent of this requirement is unclear. If the point of this effort is to determine transfer limits in a planning space, why would the analysis “respect” known SOLs. More confusion is added if the system being analyzed contains transmission upgrades which are not reflected in current known SOLs. This should be deleted, or consider revision to read: “A statement that the assessment shall consider for evaluation known system operating limits (SOLs)”. The term “respect” implies that known SOLs will be adhered to without the benefit of needed periodic re-evaluation. In the planning, as well as real-time operation, SOLs are dynamic, and may change as a result of system topography/operational changes.

R1.3 - Revise to read “A statement that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator’s planning criteria.” Planning practices should always reflect current planning criteria.

R1.4.1 - Revise to read “Generation dispatch, including but not limited to long term planned outages, additions and retirements.”

R1.4.2 - Revise to read “Transmission System topology, including but not limited to long term planned outages; transmission additions, upgrades and retirements.”

R1.4.3 - Revise to read “System demand, including peak demand”. Transfer limits at peak load are used in many Reliability Coordinator reliability assessments.

R1.4.4 - Revise to read “Current approved Firm Transmission uses”. Only approved firm transmission service should be embedded in the base case (i.e. not subject to periodic assessments) because it is reasonable to expect that these types of transfers have received formal approval after a comprehensive evaluation. Any other type of transfers may not be thought of being inconsequential to reliability until an evaluation is performed. It is also unclear what the meaning of “uses” is in this context.

R1.4.5 - What it is meant by “parallel path loop flow adjustment”? Provide an illustrative example, and it should be added as a definition and to the NERC Glossary.

R1.5 - This requirement should be revised to specify that simulations of transfers are performed mainly through the adjustment of generation only, not load. Changing the dispatch of generation resources is, in the vast majority of cases, the way that transfers are effected in real-time, and simulations should reflect this fact. The use of Phase Angle

Regulators must also be considered, and the Requirement worded to reflect the use of that equipment.

R3 – There should be a time limit with respect to when the recipient of a Transfer Capability Methodology can provide documented concerns.

R5 – It is unclear whether or not R5 includes those recipients under R2.2. R5 should be modified to state that recipients as a result of R2.2 must specifically request the assessment, and then allow 30 days from the time of request for it to be provided. Otherwise, R5 may become impossible to meet. As an example, if an entity requests the Transfer Capability Methodology under R2.2.2 six months after the assessment was completed, it is not possible to provide the assessment 45 days after it was completed.