Unofficial Comment Form
Project 2015-09 Establish and Communicate System Operating Limits

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on Project 2015-09 Establish and Communicate System Operating Limits by 8 p.m. Eastern, August 3, 2020.

Additional information is available on the project page project page. If you have questions, contact Senior Standards Developer, Latrice Harkness, (via email), or at 404-446-9728.

Background Information
The Reliability Standards that address SOLs – FAC-010, FAC-011, and FAC-014 – have remained essentially unchanged since their initial versions. Since that time, many improvements have been made to the body of reliability standards, specifically those in the TPL, TOP, and IRO family of standards. The former TPL-001, -002, -003, and -004 Reliability Standards have been replaced with TPL-001-4, all of the TOP standards were replaced with the currently effective TOP-001, TOP-002, and TOP-003, and several IRO standards have been replaced as well. One of the primary objectives of Project 2015-09 is to make changes to the FAC standards to create better alignment with the currently effective TPL, TOP, and IRO standards and the revised definitions of Operational Planning Analysis (OPA) and Real-time Assessments (RTA).

Please provide your responses to the questions listed below along with any detailed comments.
Questions

1. Industry response to the SDT’s second posting, and specifically the new FAC-011-4, Requirement 6, indicated numerous and significant concerns. Among the concerns were many industry commenters stating that SOL exceedances should be determined using the TOP and IRO standards and not an FAC standard. The SDT has responded by revising FAC-011-4, Requirement 6, removing FAC-014-3, Requirement 6, and adding TOP-001-6, Requirement R25 and IRO-008-3, Requirement R7 to have SOL exceedances determined by TOPs and RCs, respectively, per the RC’s SOL methodology and the performance framework now within FAC-011-4, Requirement R6. Do you agree with revisions made by the SDT in FAC-011-4, FAC-014-3, TOP-001-6 and IRO-008-3 with regard to SOL exceedance use and determinations?

☐ Yes
☐ No

Comments:
Please consider a 24 calendar month implementation plan, instead of 12 calendar months. Additional tracking, validation, and documentation of exceedances will be necessary. Enhancements to existing tracking tools may be required.

2. Industry response to the SDT’s second posting included many concerns regarding increased compliance and administrative logging from the SOL exceedance construct in FAC-011-4, Requirement 6. In response to these concerns, the SDT revised Requirement 6, added a new Requirement 7 to document a risk-based approach for determining how SOL exceedances are identified, and how they are communicated, including timeframes. The SDT also revised requirements and measures in TOP-001 (M14, R15, M15) and IRO-008 (R5, M5, R6, M6) to address this concern. Do you agree with revisions made by the SDT in FAC-011-4, TOP-001-6 and IRO-008-3 with regard to increased compliance risk and administrative logging?

☐ Yes
☐ No

Comments:
Please consider a 24 calendar month implementation plan, instead of 12 calendar months. Additional tracking, validation, and documentation of exceedances will be necessary. Enhancements to existing tracking tools may be required.
3. If you have any other comments regarding FAC-011-4 that you haven’t already provided, please provide them here.

Comments:
The addition of R4.7 in FAC-011-4 will have an impact on interconnection with lower system inertia such as the Québec Interconnection.

Because of its unique characteristics (main generation centers located in the north, remote from the main load centers in the south), The QI has no potential viable BES Island in underfrequency conditions. Therefore, the use of the UFLS Program does not relate to system separation. The Quebec Variance in the NERC Standard PRC-006-3 reflects that situation.

As mentioned in the rationale box for PRC-006-3 requirement D.A.3, the UFLS Program is part of the Hydro-Québec TransÉnergie defense plan to cover extreme contingencies along with two other RAS. Therefore, taking into account the reality of the QI, the use of the UFLS Program would relate more to R4.6 rather than R4.7.

We respectfully request the SDT extend the timeframe for implementation from 12 to at least 24 calendar months to support the changes needed to comply with FAC-011-4, FAC-014-3, TOP-001-6, and IRO-008-3. Some entities will need to enhance existing tools to accurately track, validate, and reconcile SOL exceedances; particularly in those instances where the Reliability Coordinator (RC) is not also the Transmission Operator (TOP). In addition to tools, implementation of the new standards will require collaboration between the RC and its respective TOPs to revise the SOL methodology and associated processes and procedures and provide relevant training to system operators. Additionally, a 24-month implementation timeframe would provide the time needed to budget, design, develop, test, implement and train on new processes and tools prior to placing them into production, particularly in light of the ongoing operational challenges associated with the COVID-19 pandemic and the anticipated demand this will place on EMS vendors as entities compete for limited resources. For these reasons, we are requesting the SDT consider extending the implementation timeframe to at least 24 months.

We would also like to suggest that additional clarity could be achieved by adding the additional phrase to FAC-011-4 R2, ‘which type of owner-provided Facility Ratings are to be used...?’

The definition of SOL includes thermal, voltage, stability, and frequency (BAL) Operating Limits. FAC-011-4 explicitly talks about voltage and stability but is silent on thermal. We don’t believe the facility rating discussion addresses SOLs for thermal limitations. We believe it would provide more clarity if the term Thermal Operation Limit was used in place of Facility Limit.

4. The SDT has received numerous comments on the new FAC-015-1 since the first posting. Acknowledging these comments, the SDT has withdrawn FAC-015-1 and consolidated its four
requirements into three requirements (R6 – R8) in proposed FAC-014-3 that retain the minimum requirements the SDT believes will allow retirement of FAC-010 and maintain limit/criteria coordination between operations and planning. Do you agree with the proposed requirements R6 through R8 in FAC-014-3?

☐ Yes
☐ No

Comments:

We have an overall concern with the term Facility Rating as applied in these FAC Standards and the confusion with those used in the MOD Standards. Does the SDT really mean Thermal Operation Limits as developed from the Facility Ratings? This set of standards talks about Steady State Voltage Limits, Stability Limits, but us silent on Thermal Operation Limits. We believe it would provide more clarity if the term Thermal Operation Limit was used in place of Facility Limit.

5. If you have any other comments regarding FAC-014-3 that you haven't already provided, please provide them here.

Comments:

NERC Standard IRO-17 obligates each Planning Coordinator and Transmission Planner to provide its Planning Assessment to impacted Reliability Coordinators. NERC TPL-001 includes the obligation that when the analysis indicates the inability of the system to meet the performance requirements. We believe FAC-014-3 R7 basically includes/requires the same if not similar information. If this additional detail is required, we suggest that IRO-017 be updated so that this type of request is located in a single requirement or standard.

6. If you have any other comments regarding TOP-001-6 or IRO-008-3 that you haven't already provided, please provide them here.

Comments:

7. With the retirement of FAC-010, and the elimination of Planning-based SOLs and IROLs, do you agree with the changes to CIP-014, FAC-003, FAC-013, PRC-002, PRC-023 and PRC-026?

☐ Yes
☐ No

Comments:

Please consider not revising CIP-014, at this time. The revision of CIP-014 applicability section 4.1.1.3 will be inconsistent with CIP-002 Attachment 1 – Impact Rating Criteria 2.6. This could lead
to uncertainty regarding applicability and impact ratings. We suggest that CIP-014 and CIP-002 should be revised at the same time.