

# 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, December 7, 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).

In order to maintain consistency with CIP-002 criteria language, the standard drafting team (SDT) will not be modifying CIP-014 during this project. The applicability language regarding the derivation of IROs will not be changed in CIP-014. The SDT has made significant enhancements in the Facilities Design, Connections, and Maintenance (FAC), Transmission Operations (TOP) and Interconnection Reliability Operations (IRO) standards addressing issues with determining and communicating SOLs and Interconnection Reliability Operating Limits (IROs). NERC is still evaluating approaches to the CIP-002 and CIP-014 language.

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

## Questions

1. Do you agree with the 24-month Implementation Plan?

Yes  
 No

Comments:

2. The SDT acted on industry comments and revised FAC-014-3 by adding requirement R5.6 and revising measure M3 and requirement R8. Do you agree with the revisions?

Yes  
 No

Comments:

We agree with the revisions, however, please consider revising and renumbering the R5.2 subrequirements as follows:

5.2.1 The value of the stability limit or IROL;

5.2.2 The associated IROL Tv for any IROL;

5.2.3 Identification of the Facilities that are critical to the derivation of the stability limit or the IROL and the associated Contingency(ies);

5.2.4 A description of system conditions associated with the stability limit or IROL; and

5.2.5 The type of limitation represented by the stability limit or IROL (e.g., voltage collapse, angular stability).

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

Comments:

Please consider if revisions to section "C. Compliance" are necessary to update FAC-014-3 with the current NERC wording for the Compliance section. For example, "Compliance Enforcement Authority" could be abbreviated as CEA in the Compliance section.

RE: Violation Severity Levels, R1, Severe VSL: Please consider removing, "as established in FAC-011-4" since this reference appears to be unnecessary.

RE: Technical Rationale for Reliability Standard FAC-014-3, Rationale R5, part 5.6: Please consider correcting the reference to 4.1.1.4 in CIP-014 to read as 4.1.1.3 in CIP-014.

### **Requirement 6**

The provided rationale document for Requirement 6 states, "The intent of Requirement 6 is not to change, limit, or modify Facility Ratings determined by the equipment owner per FAC-008, nor to allow the PCs or TPs to revise those limits. The intent is to utilize those owner-provided Facility Ratings such

that the System is planned to support the reliable operation of that System.” The rationale document also states (following on from the earlier quote), “This is accomplished by requiring the PC and TP to use the owner-provided Facility Ratings that are equally limiting or more limiting than those established in accordance with the RC’s SOL methodology.” In consideration of the RC SOL methodology to be provided per the draft FAC-001-4, Requirement 2 states, “each Reliability Coordinator shall include in its SOL methodology the method for Transmission Operators to determine which owner-provided Facility Ratings are to be used in operations such that the Transmission Operator and its Reliability Coordinator use common Facility Ratings.”

NPCC RSC believes that several standards (such as FAC-008 and MOD-032) place the obligations of determining Facility Ratings on the GO and/or TO. Additionally, from a Planning study perspective TPL-001-4 Requirement 1 obligates PCs and TPs as part of their Planning Assessment of the Near Term Transmission Planning Horizon to use data consistent with what is provided in accordance with MOD-032.

In its reply to the previous comments from the SRC IRC, the Standard Drafting Team (SDT) states that they understand the perception of redundancy of this requirement as compared to other NERC Standards, but industry and regulatory comments/inputs moved the SDT down the current path of including Facility Ratings as part of R6. Further, the SDT recognizes the facility owners responsibility in providing Facility Ratings per FAC-008 and that this does not conflict with what is proposed in FAC-014. NPCC RSC recommends that by including the Facility Ratings requirement in other standards (such as MOD-032), increased benefit is seen across additional standards and not just the Planning Assessment of Near-Term Transmission Planning Horizon.

NPCC RSC also recommends the following additional changes to the language in the requirement:

- FAC-011-4 uses the phrase, “System Voltage Limits” (see FAC-011-4 R3). FAC-014 R6 uses a mix of terms such as “System steady state voltage limits” as well as “System Voltage Limits”. We recommends that consistent terminology be used across these standards.
- FAC-011-4 uses the phrases, “stability limits”, and “stability performance criteria” (see FAC-011-4 R4). FAC-014 R6 uses a mix of terms such as “stability criteria” or just “stability”. We recommends that consistent terminology be used across these standards.

Finally, NPCC RSC recommends that the following change be made to R6 to clarify the intent of the requirement:

Each Planning Coordinator and each Transmission Planner shall implement a documented process to use Facility Ratings, System Voltage Limits and stability criteria in its Planning Assessment of the Near Term Transmission Planning Horizon that are equally limiting or more limiting than the criteria for use of Facility Ratings, System Voltage Limits and stability criteria described in its respective Reliability Coordinator’s SOL methodology.