Unofficial Comment Form
Project 2020-05 Modifications to FAC-001-3 and FAC-002-2

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on Project 2020-05 Modifications to FAC-001-3 and FAC-002-2 Standard Authorization Request (SAR). Comments must be submitted by 8 p.m. Eastern, Friday, December 11, 2020.

Additional information is available on the project page. If you have questions, contact Senior Standards Developer, Alison Oswald (via email), or at 404-446-9668.

Background Information
The NERC Inverter-based Resource Performance Task Force (IRPTF) undertook an effort to perform a comprehensive review of all NERC Reliability Standards to determine if there were any potential gaps or improvements. The IRPTF identified several issues as part of this effort and documented its findings and recommendations in the “IRPTF Review of NERC Reliability Standards White Paper,” which was approved by the Operating Committee and the Planning Committee (now part of the Reliability and Security Technical Committee (RSTC)) in March 2020. Among the findings noted in the white paper, the IRPTF identified issues with FAC-001-3 and FAC-002-2 that should be addressed.

Consistent with the IRPTF recommendations, the scope of the proposed SAR includes revisions to FAC-001-3 and FAC-002-2 to clarify requirements related to material modifications of Facilities. The purpose of FAC-001-3 is to ensure that Facility interconnection requirements exist for Transmission Owners and Generator Owners when connecting new or materially modified facilities. The purpose of FAC-002-2 is to ensure studies are performed to analyze the impact of interconnecting new or materially modified facilities on the Bulk Electric System (BES). The IRPTF identified an opportunity to clarify the term “materially modified” within these standards and to specify which entity is responsible for determining what is considered a material modification. The RSTC endorsed the SAR on June 10, 2020.

Questions
1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope please provide your recommendation and explanation.
   - [ ] Yes
   - [ ] No

   Comments:
   We suggest revising the project scope to be more definitive, instead of having several “consider’ statements. In addition, we suggest revising the SAR to allow the drafting team to Add, Modify, or Retire a Glossary Term if the drafting team decides a Glossary Term is needed for resolving ambiguity involving material modifications.
2. Provide any additional comments for the SAR drafting team to consider, if desired.

Comments:

Please update the SAR regarding references to FAC-002-2. FAC-002-3 was approved by FERC as part of the Standards Alignment with Registration Project (Project 2017-07).

While we appreciate focusing on ensuring that new technologies are adequately addressed in standards FAC-001 and FAC-002. We recommend against pursuing any effort to develop a prescriptive definition of material modification or assign the responsibility of making materiality modification determination to any other entities beyond those that already are assigned in FERC-approved Open Access Transmission Tariffs (OATTs). The processes of materiality modification determination are well defined in the OATTs and account for regional differences as it relates to the entities performing such determinations. These processes provide adequate flexibility necessary to incorporate and thoroughly study any new or existing technology. Moreover, the OATTs and their supplemental documents (manuals, guidelines, etc.) clearly identify the roles and responsibilities of the entities involved in the materiality modification determinations.

We recommend that NERC may want to change the title of this project since there is now an approved FAC-002-3 (SAR project 2017-07). Maybe they need to call it “Project 2020-05 Modifications to FAC-001-3 and FAC-002-3”.