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, April 5, 2021.

Additional information is available on the project page. If you have questions, contact Manager of Standards Development, 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 IROLs 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 (IROLs). 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. The SDT made revisions to FAC-014-3 in response to comments, namely with the inclusion of time horizons on the subparts of R5 and an annual reporting requirement in R5.6. Do you agree with the revisions? If not, please explain why.

☐ Yes
☐ No

Comments:
We support the revisions made by the SDT to FAC-014-3.

2. The SDT received numerous comments regarding whether CIP-002.5.1a should be revised based upon the drafting team’s revisions to FAC-011 and FAC-014. The SDT is not revising CIP-002.5.1a and provided a rationale document describing its reasoning with this posting. Do you agree with not revising CIP-002.5.1a and the reasoning provided? If not, please explain why?

☐ Yes
☐ No

Comments:
We support the SDT not revising CIP-002-5.1a.

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

Comments: