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

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on Reliability Standards FAC-001-4 – Facility Interconnection Requirements and FAC-002-4 – Facility Interconnection Studies by 8 p.m. Eastern, Monday, January 31, 2022.

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 based on the work and findings of the IRPTF. The IRPTF identified several issues as part of this effort and documented its findings and recommendations in a white paper. The “IRPTF Review of NERC Reliability Standards White Paper” was approved by the Operating Committee and the Planning Committee 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.

Questions
1. The SDT proposes “qualified change” to replace “material modification”. Do you agree that this is an appropriate change, eliminating confusion with the FERC defined term? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.

☐ Yes
☐ No

Comments:

2. The SDT proposes the Planning Coordinator (PC), in FAC-002-4 Requirement R6, as the entity to define what a qualified change is. Do you agree that the PC is the appropriate entity? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.

☐ Yes
☐ No

Comments:
3. The SDT proposes the new requirement R6 in FAC-002-4 and associated VRF and VSL. Do you agree that the associate VRF and VSL levels are appropriate? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.

☐ Yes
☐ No

Comments:

4. The SDT proposes that the modifications in FAC-001-4 and FAC-002-4 meet the SAR in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

☐ Yes
☐ No

Comments:

5. The SDT is proposing a 12-month implementation plan. If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

☐ Yes
☐ No

Comments:

We agree with the proposed timeframe.

6. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Comments:

It would seem clearer and more precise if in FAC-001, under R3.1 and R3.2, instead of the wordings “... new interconnections...” and “... existing interconnections seeking...”, we had “... new interconnections of Facilities...” and “... existing interconnected Facilities seeking... ”(or“... existing interconnections of Facilities seeking... ”). It seems to me that this would better and
advantageously link the text to the notion of facilities rather than to their connection, especially in the case where we are talking about modifications (qualified change). This could also be applied in FAC-002, under R1.1.1, and under R4 (R1, R2 and R3 do include the term “Facilities”). M6 of FAC-002-4 should appear as a redline in the Redline version of the standard in question.