

# Consideration of Comments on Generator

## Requirements at the Transmission Interface – Project 2010-07

The Generator Requirements at the Transmission Interface Drafting Team thanks all commenters who submitted comments on the first formal posting for Project 2010-07—Generator Requirements at the Transmission Interface. These standards were posted for a 30-day public comment period from June 17, 2011 through July 17, 2011. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 43 sets of comments, including comments from approximately 143 different people from approximately 100 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

[http://www.nerc.com/filez/standards/Project2010-07\\_GOTO\\_Project.html](http://www.nerc.com/filez/standards/Project2010-07_GOTO_Project.html)

The SDT thanks all stakeholders who provided comments. Your feedback helped the drafting team further modify its proposed standard changes, and the team believes that the changes are clearer and more technically sound because of it.

The SDT made a few substantive changes to both FAC-001 and both versions of FAC-003. With respect to FAC-001, many commenters suggested changes to both R2 and R3 to add clarity. The “activation” language in R2 now reads “...within 45 days of having an executed Agreement to evaluate the reliability impact of interconnecting a third party Facility to the Generator Owner’s existing Facility that is used to interconnect to the Transmission System...” R3 has been modified so that it is clearer that only Generator Owners applicable in accordance with R2 are required to comply, and the word “protection” in R3.1.5 has been made lowercase. Per stakeholder comments, the SDT also removed the Generator Owner from R4, because they agree that that inclusion was redundant to language in R2. Because Generator Owners have been removed from the requirement (and thus the requirement is no longer within the SDT’s scope), the SDT reverted back to the original requirement language in the approved version of the standard.

Some commenters were still concerned with the 45 day “activation” point, and indicated that more time could be needed for compliance. The SDT reminded these commenters that the 45 day timeframe is 45 days from the time the entity has a study Agreement, not 45 days to execute the Agreement altogether. Any commenters who were concerned that their Facilities could never receive an interconnection request were reminded that if that’s the case, this standard would never apply to them. And those commenters who insisted that Generator Owners could never receive a request for interconnection were reminded that in the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities. Thus, the SDT thinks it is important to clarify the responsibilities related to such a request in NERC’s Reliability Standards.

With respect to FAC-003, many commenters focused on the half-mile qualifier in both versions of the standard. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." The SDT believes that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, the team maintains that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.

The majority of commenters did not suggest the addition of any standards or requirements to the team's scope of work, and a few commenters cautioned strongly against any additions. Some commenters suggested that the team consider including those standards and requirements listed in the June 2011 Cedar Creek and Milford FERC orders. The drafting team has considered the inclusion of the requirements listed in the Cedar Creek and Milford orders in the past, and we have been revisiting them throughout our process. We continue to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including additional standards or requirements. The team has elected to propose a slight clarifying change in PRC-004-2, but no changes to the applicability of that or any other standard.

While the drafting team will not be adding standards at this time because they do not believe such additions are technically justified or justified by stakeholder comments, the SDT will be seeking some additional informal feedback from industry groups to ensure that their technical justifications are sound and supported by others outside of the drafting team. The current draft documents showing the team's rationale and technical justification for including/excluding standards for revision under this project have been posted for information on the project page with this posting. If you have any specific feedback on these documents, you are welcome to email [mallory.huggins@nerc.net](mailto:mallory.huggins@nerc.net).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 404-446-2560 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Standard Processes Manual:  
[http://www.nerc.com/docs/standards/sc/Standard\\_Processes\\_Manual\\_Approved\\_May\\_2010.pdf](http://www.nerc.com/docs/standards/sc/Standard_Processes_Manual_Approved_May_2010.pdf).

## Index to Questions, Comments, and Responses

1. Do you support the proposed redline changes to FAC-001-1? ..... 11
2. Do you support the one year compliance timeframe for Generator Owners as proposed in the Implementation Plan for FAC-001-1?..... 28
3. Taking into consideration that only one of the versions of FAC-003 will actually be implemented, a decision that will be made as the Project 2010-07 drafting team learns more about the status of Project 2007-07—Vegetation Management, do you support the proposed redline changes to FAC-003-X and FAC-003-3? ..... 33
4. The drafting team has added Generator Owners to the Applicability sections of FAC-003-X and FAC-003-3 with the qualifier that the included lines “extend greater than one half mile beyond the fenced area of the switchyard, generating station or generating substation up to the point of interconnection with the Transmission system.” The team received many comments about the need to define a distance rather than other measures for exclusion, and decided on the one half mile as a reasonable distance. Do you agree with this half-mile qualifier?..... 43
5. Do you support the two year compliance timeframe for Generator Owners as included and explained in the Implementation Plans for FAC-003-X and FAC-003-3?..... 53
6. In its background resource document, the drafting team lists the standards that it has not modified, and offers rationale for its decisions. Are there any reliability standards or requirements that you believe should apply to Generator Owners or Generator Operators that own and are responsible for the operation of an overhead Facility, that are not already applicable or have been proposed to be applicable (FAC-001 and FAC-003) by the Project 2010-07 drafting team? If so, please list them and offer an explanation as to why they should be applicable to that entity. .... 57
7. Do you have any other questions or concerns with the proposed standards or with the background resource document that have not been addressed? If yes, please explain.63



Group/Individual	Commenter	Organization	Registered Ballot Body Segment																																																																																																									
			1	2	3	4	5	6	7	8	9	10																																																																																																
17. Robert Pellegrini	The United Illuminating Company	NPCC	1																																																																																																									
18. Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																																																																																																									
19. Saurabh Saksena	National Grid	NPCC	1																																																																																																									
20. Michael Schiavone	National Grid	NPCC	1																																																																																																									
21. Wayne Sipperly	New York Power Authority	NPCC	5																																																																																																									
22. Donald Weaver	New Brunswick System Operator	NPCC	2																																																																																																									
23. Ben Wu	Orange and Rockland Utilities	NPCC	1																																																																																																									
2.	Group	Gerald Beckerle	SERC OC Standards Review Group										X		X																																																																																													
<table border="1"> <thead> <tr> <th>Additional Member</th> <th>Additional Organization</th> <th>Region</th> <th>Segment Selection</th> </tr> </thead> <tbody> <tr><td>1. Scott Brame</td><td>NCEMC</td><td>SERC</td><td>1, 3, 5, 9</td></tr> <tr><td>2. Dan Roethemeyer</td><td>Dynegy</td><td>SERC</td><td>4, 5, 6</td></tr> <tr><td>3. Jeff Harrison</td><td>AECI</td><td>SERC</td><td>1, 3, 5</td></tr> <tr><td>4. Scott McGough</td><td>OPC</td><td>SERC</td><td>5</td></tr> <tr><td>5. Alisha Ankar</td><td>Prairie Power</td><td>SERC</td><td>3, 5</td></tr> <tr><td>6. Robert Thomasson</td><td>Big Rivers</td><td>SERC</td><td>1, 3, 5, 9</td></tr> <tr><td>7. Bob Dalrymple</td><td>TVA</td><td>SERC</td><td>1, 3, 5, 9</td></tr> <tr><td>8. Dale Donmoyer</td><td>Calpine</td><td>SERC</td><td>5</td></tr> <tr><td>9. Richard Dearman</td><td>TVA</td><td>SERC</td><td>1, 3, 5, 9</td></tr> <tr><td>10. Andy Burch</td><td>EEL</td><td>SERC</td><td>1, 5</td></tr> <tr><td>11. Eugene Warnecke</td><td>Ameren</td><td>SERC</td><td>1, 3</td></tr> <tr><td>12. Gene Delk</td><td>SCE&amp;G</td><td>SERC</td><td>1, 3, 5</td></tr> <tr><td>13. Larry Rodriguez</td><td>Entegra</td><td>SERC</td><td>5</td></tr> <tr><td>14. Randy Hubbert</td><td>Southern</td><td>SERC</td><td>1, 3, 5</td></tr> <tr><td>15. Jim Viikinsalo</td><td>Southern</td><td>SERC</td><td>1, 3, 5</td></tr> <tr><td>16. Marc Butts</td><td>Southern</td><td>SERC</td><td>1, 3, 5</td></tr> <tr><td>17. Ken Parker</td><td>Entegra</td><td>SERC</td><td>5</td></tr> <tr><td>18. Bill Autrey</td><td>Alabama Power</td><td>SERC</td><td>1, 3, 5</td></tr> <tr><td>19. Melvin Roland</td><td>Southern</td><td>SERC</td><td>1, 3, 5</td></tr> <tr><td>20. Mike McCollum</td><td>OPC</td><td>SERC</td><td>5</td></tr> <tr><td>21. Mike Hirst</td><td>Cogentrix</td><td>SERC</td><td>5, 6</td></tr> </tbody> </table>																					Additional Member	Additional Organization	Region	Segment Selection	1. Scott Brame	NCEMC	SERC	1, 3, 5, 9	2. Dan Roethemeyer	Dynegy	SERC	4, 5, 6	3. Jeff Harrison	AECI	SERC	1, 3, 5	4. Scott McGough	OPC	SERC	5	5. Alisha Ankar	Prairie Power	SERC	3, 5	6. Robert Thomasson	Big Rivers	SERC	1, 3, 5, 9	7. Bob Dalrymple	TVA	SERC	1, 3, 5, 9	8. Dale Donmoyer	Calpine	SERC	5	9. Richard Dearman	TVA	SERC	1, 3, 5, 9	10. Andy Burch	EEL	SERC	1, 5	11. Eugene Warnecke	Ameren	SERC	1, 3	12. Gene Delk	SCE&G	SERC	1, 3, 5	13. Larry Rodriguez	Entegra	SERC	5	14. Randy Hubbert	Southern	SERC	1, 3, 5	15. Jim Viikinsalo	Southern	SERC	1, 3, 5	16. Marc Butts	Southern	SERC	1, 3, 5	17. Ken Parker	Entegra	SERC	5	18. Bill Autrey	Alabama Power	SERC	1, 3, 5	19. Melvin Roland	Southern	SERC	1, 3, 5	20. Mike McCollum	OPC	SERC	5	21. Mike Hirst	Cogentrix	SERC	5, 6
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			1	2	3	4	5	6	7	8	9	10			
22. William Berry	OMU	SERC	1, 3, 5												
23. Brent Davis	Entergy	SERC	1, 3												
24. Brad Young	LGE/KU	SERC	1, 3, 5												
25. Wes Davis	SERC	SERC	10												
3.	Group	Carol Gerou	Midwest Reliability Organization's NERC Standards Review Forum (NSRF)	X	X	X	X	X	X						
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Mahmood Safi	Omaha Public Power Dist	MRO	1, 3, 5, 6											
2.	Chuck Lawrence	American Transmission Company	MRO	1											
3.	Tom Webb	Wisconsin Public Service Corporation	MRO	3, 4, 5, 6											
4.	Jodi Jenson	Western Area Power Administration	MRO	1, 6											
5.	Ken Goldsmith	Alliant Energy	MRO	4											
6.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6											
7.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6											
8.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6											
9.	Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6											
10.	Joseph DePoorter	Madison Gas and Electric Company	MRO	3, 4, 5, 6											
11.	Scott Nichols	Rochester Public Utilities	MRO	4											
12.	Terry Harbour	MidAmerican Energy Company	MRO	1, 3, 5, 6											
13.	Richard Burt	Minnkota Power Cooperative	MRO	1, 3, 5, 6											
14.	Tony Eddleman	Nebraska Public Power District	MRO	1, 3, 5											
15.	Scott Bos	Muscatine Power and Water	MRO	3, 4, 5, 6											
16.	Lee Kittleson	Otter Tail Power Company	MRO	5, 1, 3, 6											
17.	Marie Knox	Midwest ISO	MRO	2											
4.	Group	Connie Lowe	Electric Market Policy	X		X		X	X						
	<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1.	Mike Crowley	SERC		1											
2.	Louis Slade	RFC		5, 6											
3.	Michael Gildea	NPCC		5, 6											
4.	Mike Garton	MRO		5, 6											

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
5.	Group	Charles W. Long	SERC Planning Standards Subcommittee	X									X
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	John Sullivan	Ameren Services Co.	SERC	1									
2.	James Manning	NC Electric Membership Corp.	SERC	1									
3.	Philip Kleckley	SC Electric & Gas Co.	SERC	1									
4.	Pat Huntley	SERC Reliability Corp.	SERC	10									
5.	Bob Jones	Southern Company Services	SERC	1									
6.	Group	Jesus Sammy Alcaraz	Imperial Irrigation District (IID)	X		X	X	X	X				
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Tino Zaragoza	IID	WECC	1									
2.	Jesus Sammy Alcaraz	IID	WECC	3									
3.	Diana Torres	IID	WECC	4									
4.	Marcela Caballero	IID	WECC	5									
5.	Cathy Bretz	IID	WECC	6									
7.	Group	Brent Ingebrigtsen	LG&E and KU Energy	X		X		X	X				
No additional members listed.													
8.	Group	John Seelke	Public Service Enterprise Group	X		X		X	X				
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Ken Brown	PSE&G	RFC	1, 3									
2.	Clint Bogan	PSEG Fossil	RFC	5									
3.	Peter Dolan	PSEG ER&T	RFC	6									
4.	Scott Slickers	PSEG Fossil	NPCC	5									
5.	Eric Schmidt	PSEG ER&T	NPCC	6									
6.	Mikhail Falkovich	PSEG Fossil	ERCOT	5									
9.	Group	Jonathan Hayes	SPP Reliability Standards Development Team		X								
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Valerie Pinamonti	AEP	SPP	1, 3, 5									
2.	Newton Alan Ward	AEP	SPP	1, 3, 5									

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			1	2	3	4	5	6	7	8	9	10		
3. Mahmood Safi	OPPD	SPP	1, 3, 5											
4. John Allen	SPRM	SPP	1, 4											
5. Mitch Williams	Western Farmers	SPP	1, 3, 5											
6. Robert Cox	Lee County Electric		NA											
7. Don Reinert	Westar	SPP	1, 3, 5, 6											
8. Robert Rhodes	SPP	SPP	2											
10. Group	Annette Bannon	PPL Supply Group						X	X					
<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1. Leland McMillan	PPL Montana, LLC	WECC	5											
2. Don Lock	Lower Mount Bethel Energy, LLC	RFC	5											
3.	PPL Brunner Island, LLC	RFC	5											
4.	PPL Holtwood, LLC	RFC	5											
5.	PPL Martins Creek, LLC	RFC	5											
6.	PPL Montour, LLC	RFC	5											
7. Mark Heimbach	PPL EnergyPlus, LLC	MRO	6											
8.	PPL EnergyPlus, LLC	NPCC	6											
9.	PPL EnergyPlus, LLC	RFC	6											
10.	PPL EnergyPlus, LLC	SERC	6											
11.	PPL EnergyPlus, LLC	SPP	6											
12. John Cummings	PPL EnergyPlus, LLC	WECC	6											
11. Group	Jason Marshall	ACES Power Members							X					
<b>Additional Member</b>	<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>											
1. Darin Adams	East Kentucky Power Cooperative	SERC	1, 3, 5											
2. Susan Sosbe	Wabash Valley Power Association	RFC	3											
3. Mohan Sachdeva	Buckeye Power	RFC	3, 5											
12. Individual	Chris Higgins	Bonneville Power Administration		X		X		X	X					
13. Individual	Jack Cashin	EPSA						X	X					
14. Individual	Sandra Shaffer	PacifiCorp		X		X		X	X					
15. Individual	Janet Smith, Regulatory	Arizona Public Service Company		X		X		X	X					



Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
		Affairs Supervisor											
16.	Individual	Bo Jones	Westar Energy	X		X		X	X				
17.	Individual	Antonio Grayson	Southern Company					X					
18.	Individual	Mike Laney	Luminant Power					X					
19.	Individual	Thad Ness	American Electric Power	X		X		X	X				
20.	Individual	Edward Cambridge	APS	X		X		X					
21.	Individual	Gretchen Schott	BP Wind Energy North America Inc.										
22.	Individual	Katy Mirr	Sempra Generation					X					
23.	Individual	Brian Evans-Mongeon	Utility Services, Inc.								X		
24.	Individual	Samuel Reed	Tri-State Generation and Transmission, Inc.	X				X					
25.	Individual	Alice Ireland	Xcel Energy	X		X		X	X				
26.	Individual	Jody Nelson	Georgia Transmission Corporation	X									
27.	Individual	Bill Rees	BGE	X									
28.	Individual	John Bee	Exelom	X		X		X					
29.	Individual	Michelle D'Antuono	Ingleside Cogeneration LP					X					
30.	Individual	Dale Fredrickson	Wisconsin Electric			X	X	X					
31.	Individual	Keith Morissette	Tacoma Power	X		X	X	X	X				
32.	Individual	Joe Petaski	Manitoba Hydro	X		X		X	X				
33.	Individual	Greg Rowland	Duke Energy	X		X		X	X				
34.	Individual	Amir Hammad	Constellation Power Generation					X					
35.	Individual	Kirit Shah	Ameren	X		X		X	X				
36.	Individual	Rex Roehl	Indeck Energy Services					X					
37.	Individual	Chad Bowman	CHPD	X		X		X					
38.	Individual	Andrew Z Pusztai	American Transmission Company	X									
39.	Individual	Michael Falvo	Independent Electricity System Operator		X								

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40.	Individual	Doug Hohlbaugh	FirstEnergy Corp	X		X	X	X	X				
41.	Individual	Sandy O'Connor	TransAlta Centralia Generation LLC	X				X					
42.	Individual	Natalie McIntire	American Wind Energy Association										
43.	Individual	Donald Brookhyser	Cogeneration Association of California										

## 1. Do you support the proposed redline changes to FAC-001-1?

**Summary Consideration:** The SDT thanks all individuals and groups who provided feedback. The majority of comments indicated support for the SDT's changes to FAC-001, and the team has made additional changes, based on commenter feedback, where they believe those changes add clarity.

Commenters suggested changes to both R2 and R3 to add clarity. The "activation" language in R2 now reads "...within 45 days of having an executed Agreement to evaluate the reliability impact of interconnecting a third party Facility to the Generator Owner's existing Facility that is used to interconnect to the Transmission System..." R3 has been modified so that it is clearer that only Generator Owners applicable in accordance with R2 are required to comply, and the word "protection" in R3.1.5 has been made lowercase. Per stakeholder comments, the SDT also removed the maintenance requirements for the Generator Owner from R2, and the Generator Owner from R4 altogether. Because Generator Owners have been removed from the requirement (and thus the requirement is no longer within the SDT's scope), the SDT reverted back to the original requirement language in the approved version of the standard.

Some commenters were still concerned with the 45 day "activation" point, and indicated that more time could be needed for compliance. The SDT reminded these commenters that the 45 day timeframe is 45 days from the time the entity has a study Agreement, not 45 days to execute the Agreement altogether. Any commenters who were concerned that their Facilities could never receive an interconnection request were reminded that if they are correct, this standard would not apply to them. Those commenters who insisted that Generator Owners could never receive a request for interconnection were reminded that in the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities. Thus, the SDT believes it is important to clarify the responsibilities related to such a request in NERC's Reliability Standards.

Some commenters brought up tariff-related issues. While the SDT has made changes attempting to clarify what was perceived by some commenters to be ambiguous qualifying language in R2, and while the commenters are correct that a valid interconnection would likely need to go through the generator interconnection process under its applicable tariff, it would be inappropriate for any market- or tariff-related language to be included in a NERC Reliability Standard. The goal of the drafting team was simply to clarify a Generator Owner's obligations, under NERC's Reliability Standards, for handling an interconnection request and the related interconnection requirements.

Several commenters also suggested changes to VRFs and VSLs. Because the SDT did not make any substantive changes to R1 or R4, the team only made changes to the VSLs or VRFs if we were correcting a typo; anything substantive would be outside the scope of this SDT. In the case of R2 and R3, changes were made per commenter suggestions.

Finally, the formatting error in the Applicability section has been corrected.

For a more detailed explanation of the team’s rationale, please see the accompanying FAC-001-1 technical justification.

Organization	Yes or No	Question 1 Comment
Midwest Reliability Organization's NERC Standards Review Forum (NSRF)	No	<p>In general, the NSRF supports the changes to FAC-001-1. However the 45 days to execute an agreement would be a significant burden on a Generator Operator that does not have an existing process in place. The NSRF believes an aggressive but realistic time frame is 120 days. This would allow sufficient time to develop the procedure and obtain the necessary technical and legal reviews.</p> <p>Please clarify why "Protection" is capitalized in section 3.1.5. "Protection System" is defined by NERC but "System Protection" is not.</p> <p>Recommend the "half mile" statement be included within the Applicability section of this Standard as it stated in FAC-003-X.</p>
<p><b>Response:</b> Thank you for your comment. The team proposed 45 days from the time the entity has a study Agreement, not 45 days to execute the Agreement altogether. Please see the SDT’s accompanying FAC-001-1 technical justification for a more detailed explanation of the team’s rationale for using that time frame. No change made.</p> <p>“Protection” in 3.1.5 has been made lowercase.</p> <p>With respect to the “half mile” comment, an entity could receive an interconnection request for its interconnection Facility at any point along that Facility. An exemption or exclusion based on the length of the Facility is not justified because doing so would create a reliability gap. No change made.</p>		
Public Service Enterprise Group	No	<p>The language in R2 needs to be clarified with regards to the term “its existing generation Facility.” The interconnection leads are considered part of the “existing generation Facility,” but so are the generator, generator step-up transformer and other equipment associated with the generator. The project Background Resource Document (p.2) makes it clear that the interconnection to an existing generator facility is contemplated to be to the “existing interconnecting Facility that is owned by a generator” - i.e., the generator’s interconnection leads. We propose that the term “its existing generation Facility” be replaced with “the Generator Owner’s existing interconnecting transmission Facility.”</p>
<p><b>Response:</b> Thank you for your comment. We agree that some additional specification could be useful, and we have used the suggested</p>		

Organization	Yes or No	Question 1 Comment
clarifying language.		
SPP Reliability Standards Development Team	No	<p>We are concerned that some of the language is ambiguous. We would like to be clear that placing new requirements on Generator Owners that are already in place and have been in place under FERC policy is inaccurate. We want to make sure that regardless of what the generator tie line is classified as, that a valid interconnection would go through the Generator Interconnection process under its applicable tariff.</p> <p>Format error in 2.4.1 should read 4.2.1 in applicability.</p> <p>We would like to see more definition in applicability section 4.2. How does the Generator Owner get involved in this process?</p> <p>The VRF for R4 is listed as a medium and appears to us as an administrative requirement. We would recommend that the VRF be changed to low.</p> <p>The moderate and high VSL for R1 seems to be duplicative. We would recommend taking a second look and would recommend that the high should be that “if you failed to do two of the following”.</p> <p>We would recommend that the VSL on R4 read: “The responsible entity failed to make the requirements available within 30 business days after a request.”</p>
<p><b>Response:</b> Thank you for your comment. We have attempted to clarify what was perceived by some commenters to be ambiguous qualifying language. You are correct that a valid interconnection would likely need to go through the generator interconnection process under its applicable tariff, but it would be inappropriate for any market- or tariff-related language to be included in a NERC Reliability Standard. The goal of the drafting team was simply to clarify a Generator Owner’s obligations, under NERC’s Reliability Standards, for handling an interconnection request and the related interconnection requirements.</p> <p>The format error in the applicability section has been corrected.</p> <p>A Generator Owner can get involved in the process by receiving a request for interconnection on their Facility and executing an Agreement to evaluate the reliability impact of that request. The team has attempted to clarify to qualifying language in the applicability section with its latest proposed changes. Please see the SDT’s accompanying FAC-001-1 technical justification for a more detailed explanation of the team’s rationale.</p> <p>With respect to the VRF for R4, we agree that “low” might be more appropriate, but that change is outside the scope of this drafting team. Your suggestion will be submitted in a Suggestion Form and added to NERC’s Issues Database to be addressed in a future project.</p>		

Organization	Yes or No	Question 1 Comment
<p>With respect to the moderate and high VSLs for R1, we agree that they are duplicative and believe this was a typo. Change made.</p> <p>With respect to the proposed language change in the VSL for R4, while we agree that the VSL should be written in the negative rather than the positive that change would be outside the scope of this drafting team. Your suggestion will be submitted in a Suggestion Form and added to NERC's Issues Database to be addressed in a future project.</p>		
PPL Supply Group	No	<p>A Generator Owner subject to the proposed standard (i.e., with an executed Agreement to evaluate the reliability impact of interconnecting another Facility to its existing generation Facility) should only be responsible for evaluating the impact of such interconnection on its facilities. Generation Owners should have no responsibility for evaluating impacts on interconnected or adjacent Transmission Owner systems. GOs do not have staff trained or tools available to perform the studies necessary to evaluate reliability impacts of such interconnections on Transmission Owner systems which can extend geographically far beyond the POI. The SDT should clarify that Transmission Owners are solely responsible for evaluating and addressing any impacts on their systems.</p>
<p><b>Response:</b> Thank you for your comment. In the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities, and the drafting team thinks it is important to clarify the responsibilities related to such a request in NERC's Reliability Standards. The drafting team does not believe the standard as written requires the Generator Owner to be responsible for any interconnection Facility past the point of interconnection with the Transmission Owner's Facility. Please see the SDT's accompanying FAC-001-1 technical justification for a more detailed explanation of the team's rationale. No change made.</p>		
ACES Power Members	No	<p>We support the concept of modifying FAC-001-1 to include Generation Owners that own transmission lines that interconnect them to the BES for the purpose of eliminating the need to register Generation Owners as Transmission Owners. However, there are serious issues with the implementation of the FAC-001-1. The changes conflict with the tariff process of many established markets as well as the FERC pro forma tariff. Requests to interconnect are generally governed by tariffs. The request will be submitted to the transmission provider established by the tariff. The transmission provider will then perform the necessary studies such as system impact or feasibility studies to determine any necessary upgrades through its long-term planning function. After the completion of these studies or in parallel with them, the Transmission Owner (or Generation Owner that owns transmission) will perform the facility connection study. This may or may not require an additional contract as it may be governed completely under the tariff or may be covered under a blanket agreement in an organized</p>

Organization	Yes or No	Question 1 Comment
		<p>market. The language referring to the executed Agreement in the standard should be dropped as it is confusing and may not cover many situations. Rather, the standard should apply to the Generation Owner that owns Transmission and is not registered as Transmission Owner.</p> <p>R2 should be modified such as the Generation Owner that owns Transmission is required to create facility connection requirements upon request from the Planning Coordinator or Transmission Planner. While the NERC Functional Model is not clear on the function that performs the interconnection study, it likely will be either the Transmission Planner or the Planning Coordinator. Interconnection studies are typically long-term planning studies. Thus, it is the Transmission Planner or Planning Coordinator that will receive the interconnection request and determine on whose equipment will be impacted.</p> <p>R3 is problematic and contradicts the purpose of R2. R3 requires the Generation Owner that owns Transmission to have Facility connection requirements at all times. It appears the drafting team intended for R3 to simply define what must be included in the facility connection requirements. To do this, we suggest the drafting team remove the Generation Owner that owns Transmission from the requirement and copy the part 3.1 and its sub-parts to R2. The following language should be struck from R2: "to ensure compliance with NERC Reliability Standards and applicable Regional Entity, subregional, Power Pool, and individual Transmission Owner planning criteria and Facility connection requirements". These requirements already exist elsewhere and inclusion here creates the potential for double jeopardy. R4 should be struck. There is no need for the Generator Owner that owns transmission to maintain its facility connection requirements. They should only be required to review and update them when they get a request. Tariff processes will already require them to make the facility connection requirements available to interconnection requesters.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team believes that the execution of an Agreement to evaluate the reliability impact of interconnecting a third party Facility is the appropriate "activation" point for this standard for applicable Generator Owners. We have changed the language in the requirement to accommodate situations where it was not the Generator Owner itself that executed the Agreement. Please see the SDT's accompanying FAC-001-1 technical justification for a more detailed explanation of the team's rationale.</p> <p>R3 has been modified to more clearly apply only to Generator Owners in accordance with R2. Per your suggestion about maintenance, the drafting team has removed the maintenance obligation for Generator Owners. For more information on our rationale with respect to this, please see the accompanying FAC-001-1 technical justification document.</p>		
Westar Energy	No	We suggest the VRF for R4 be changed from medium to low, as it is administrative in nature. We recommend the high VSL for R1 read, "The Transmission Owner failed to do two of the

Organization	Yes or No	Question 1 Comment
		following.”
<p><b>Response:</b> Thank you for your comment. We agree that “low” might be more appropriate, but that change is outside the scope of this drafting team. Similarly, any change to the VSLs for R1 is outside the scope of this drafting team as that requirement does not include any reference to Generator Owners; we only made changes if the previous text appeared to have a typo. Your suggestions will be submitted in a Suggestion Form and added to NERC’s Issues Database to be addressed in a future project.</p>		
Southern Company	No	<p><b>A.</b> Southern does not think that the revision to FAC-001-1 is necessary. A Generator Owner (GO) cannot assess reliability impacts to the Bulk Electric System (BES) and determine acceptability without support and involvement of the applicable owner and operator of the Transmission System. A generator tie-line does not equate to a Transmission System. A GO must already adhere to a TO’s Facility connection requirements whether the GO wants to connect additional facilities or a third parties facilities to its own interconnection Facilities. Stated another way, the GO does not need Facility Connection requirements to govern how multiple units are tied to a collector bus so why are they needed for a third party to connect to an existing tie-line? In either case it is the interconnected TO that has connection requirements that must be fulfilled. The GO’s Interconnection Agreement would prohibit it from connecting additional facilities without a new application for Interconnection Service with its interconnected Transmission Provider. A GO should not need to develop “connection requirements” unless it is in the business of owning and operating facilities independently of its interconnected Transmission Provider.</p> <p>We do not believe a reliability gap exists in FAC-001-1 because the requestor for interconnecting another Facility to an existing generation Facility must coordinate with the applicable TO, TP, and PA in accordance with FAC-002-0 to ensure they meet all applicable facility connection and performance requirements. If and when there is an agreement in place for a third party to connect to a generator tie-line then the tie-line would become part of the integrated system and its purpose and the owner’s function would likely warrant registration as a TO/TOP and FAC-001 would then apply. The following excerpt from the 2010-07 Background Resource Document acknowledges that this may be necessary: “The drafting team also acknowledges that, if another party interconnects to a Facility owned by a Generator Owner, there may be the need to address MOD or TPL standards. However, the drafting team believes that this, too, is best handled through specific evaluation, perhaps accompanied by changes to the compliance registry. Entities that face this kind of scenario may also meet criteria applicable to other registrations such as Transmission Service Provider or Transmission Planner.”</p>



Organization	Yes or No	Question 1 Comment
		<p><b>B.</b> If the Project 2010-07 Drafting Team decides to continue revising FAC-001-1, there are jurisdictional, interconnection policy and open access transmission tariff issues that will need to be considered.</p> <p><b>(1)</b> Because of (a) jurisdiction under Section 215, (b) FERC’s interconnection policy, and (c) the requirements of the pro forma open access transmission tariff (OATT), a GO should not be required to comply with FAC-001-1 until that GO’s generating Facility reaches commercial operation.</p> <p><b>(a)</b> Jurisdiction under FPA Section 215. First, it is not clear that NERC or FERC has jurisdiction under FPA Section 215 to require generation facilities that have not actually reached commercial operation to be subject to reliability standards. Section 215(a)(2) of the FPA defines the “Electric Reliability Organization” as “the organization certified by the Commission ... the purpose of which is to establish and enforce reliability standards for the bulk-power system, subject to Commission review.” Further, (a)(3) provides that “The term ‘reliability standard’ means a requirement, approved by the Commission under this section, to provide for reliable operation of the bulk-power system. The term includes requirements for the operation of existing bulk-power system facilities ... the design of planned additions or modifications to such facilities to the extent necessary to provide for reliable operation of the bulk-power system ....” Thus, under Section 215 NERC can develop reliability standards that address requirements for existing bulk-power system facilities (i.e., facilities that have reached “commercial operation”) and for the design of planned additions or modifications. It is logical to interpret the phrase “design of new facilities” as meaning that new facilities must be designed to comply with existing reliability standards. However, it is not clear that this provision should be interpreted as requiring that a generating facility that has not yet reached commercial operation should be subject to reliability standards (including audit and penalties). Therefore, the GO with the existing generation facilities should not be required to incorporate the proposed generation facility into its Facility connection requirements before the proposed generation facility is subject to NERC or FERC jurisdiction.</p> <p><b>(b)</b> FERC’s interconnection policy. In addition, the revised FAC-001 would appear to place restrictions on interconnection customers in contravention of Order Nos. 2003 and 2006 (Standard Large and Small Interconnection Procedures and Agreements). FERC was very concerned about the ability of interconnection customers to interconnect their generating facilities and gave them a fair amount of flexibility. However, this revised</p>

Organization	Yes or No	Question 1 Comment
		<p>FAC-001 would appear to restrict some of this flexibility.</p> <p><b>(i)</b> Order No. 2003 gives the interconnection customer the ability to terminate a proposed interconnection on ninety days notice. Therefore, the interconnection customer is not required to build the facility. However, this revised FAC-001 appears to assume that the interconnection customer does not have this flexibility. What if the interconnection customer (the GO building a new generator on its site or the third party building a new generation facility) decides to terminate the Large Generator Interconnection Agreement (LGIA) or not proceed with the generation facility? In such event, the GO may be required to revert to its previous Facility connection requirements in order to accommodate the original configuration.</p> <p><b>(ii)</b> The LGIA permits modifications to the proposed interconnection. How would this affect the Facility connection requirements? How long would the GO have to revise its Facility connection requirements? In the event that there is a single modification, or perhaps multiple modifications, how does the GO stay in compliance with this standard?</p> <p><b>(iii)</b> FAC-001-1, R4 provides that each GO with Facility connection requirements and each TO shall maintain Facility connection requirements and make documentation of these requirements available to users of the Transmission System upon request. However, Large Generator Interconnection Procedures (LGIP), Section 3.4 requires the posting of certain interconnection information but the identity of the interconnection customer is not to be disclosed (unless it is an Affiliate). Requirement R4 would appear to potentially require disclosure of information and (more importantly) of the interconnection customer's identity in contravention of the requirements in Order No. 2003 and the LGIP.</p> <p><b>(c)</b> OATT requirements. The definition of "applicable Generator Owner" (Section 4.2.1) and Requirement R2 provide that the GO will have an executed Agreement to evaluate the impact of interconnecting a new facility to the GO's existing generation facility. This statement is ambiguous. This statement could be understood to mean that the GO of the existing generation Facility will enter into an Agreement with the GO proposing to interconnect and the existing GO will evaluate the impact of the proposed interconnection. However, requests to interconnect new generation are processed under an OATT. In that case, it would be the Transmission Provider (not the existing GO) that would evaluate the impact of interconnecting the new facility. Thus, the language in FAC-001-1 would need</p>

Organization	Yes or No	Question 1 Comment
		<p>to be revised to clarify that the owner of the new facility will need to interconnect under the OATT of an appropriate Transmission Provider (i.e., the Transmission Provider to which the existing GO is interconnected, not with the existing GO). Therefore, the owner of the new facility will most likely be the entity with the executed Agreement (with the Transmission Provider). Another consideration is that the existing GO could be developing a merchant transmission line. In that case, the existing GO would need to evaluate whether it needs have its own OATT and OASIS. In that case, the new generator owner would be interconnecting to the existing GO. However, the existing GO's line would not be a generator tie-line. This issue is not clear from the draft standard.</p> <p><b>(2)</b> The following are suggested changes to FAC-001-1.</p> <p><b>(a)</b> We recommend the Purpose statement be revised to state, "To avoid adverse impacts on BES reliability..."</p> <p><b>(b)</b> The numbering for "Applicable Generator Owner" should be 4.2.1 instead of 2.4.1.</p> <p><b>(c)</b> It is not clear who may request to interconnect to the Generator Owners' facility. The Background Resource document states that "[b]ecause Generator Owners may be requested to allow interconnection to their Facilities" - this would imply that a third party may request interconnection to the Generator Owner's Facilities. However, draft FAC-001-1 discusses "interconnecting another Facility to its existing generation Facility." This issue needs to be clarified. Is it simply when a Generator Owner proposes to add a new facility to its existing facility or does it also include a third party request to interconnect to the Generator Owner facilities?</p> <p><b>(d)</b> R4 should be revised to delete the requirement to maintain the Facility connection requirements because this is redundant to language in R1 (and R2, which we believe is not needed). In addition, R4 should be revised to state, "...on requests within five (5) business days" since the time requirement is essential for measurement of non-compliance as indicated by the VSLs.</p> <p><b>(e)</b> The Severe VSL for R3 should be revised to delete the second portion which states, "The responsible entity does not have Facility connection requirements." This non-compliance would be covered by the first portion of the two-part OR requirement (...four or more...). It is also covered by the Severe VSL of R1.</p> <p><b>(3)</b> Effect of the proposed revisions to FAC-001-1 on FAC-002-1.</p>

Organization	Yes or No	Question 1 Comment
		<p><b>(a)</b> As drafted, there are scenarios under which a new GO may attempt to interconnect to an existing GO even though, as explained above, the interconnection should actually be done to the appropriate Transmission Provider. If the appropriate Transmission Provider is not included in the evaluation of the interconnection various types of harm may occur. In such event, the TPs and PAs should be indemnified from any liability with respect to performance of the evaluations required by FAC-002.</p> <p><b>(b)</b> FAC-001 and FAC-002 should be revised to be clear that the existing GO and any new GOs must coordinate any interconnection with the appropriate Transmission Provider, TP and PA.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team has considered the jurisdictional, interconnection policy and open access transmission issues that you raise. But in the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities, and the drafting team thinks it is important to clarify the responsibilities related to such a request in NERC’s Reliability Standards. You are correct that a jurisdictional, interconnection policy, and open access transmission tariff issues maybe have an impact, but it would be inappropriate for any market- or tariff-related language to be included in a NERC Reliability Standard. The goal of the drafting team was simply to clarify a Generator Owner’s obligations, under NERC’s Reliability Standards, for handling an interconnection request and the related interconnection requirements. Please see the SDT’s accompanying FAC-001-1 technical justification for a more detailed explanation of the team’s rationale.</p> <p>With respect to your suggested changes in section 2:</p> <ol style="list-style-type: none"> <li>Any change to the purpose statement would be outside the scope of this team. Please submit a <a href="#">Suggestion Form</a> to NERC if you continue to feel that this change is necessary.</li> <li>That formatting change has been made.</li> <li>The drafting team has worked to clarify who may request to interconnect to the Generator Owner’s Facility.</li> <li>The maintenance requirements in R2 and R4 are no longer applicable to Generator Owners. For more information on our rationale on this issue, please see the accompanying FAC-001-1 technical justification document.</li> <li>The drafting team agrees that the second portion of the Severe VSL for R3 is redundant. While other changes to VSLs and VRFs have been outside the scope of the team, because the SDT has made changes to R3, we feel comfortable making this change.</li> </ol> <p>For a more detailed justification of our changes to FAC-001 with respect to your comments in the third section, please see the FAC-001 justification document that is posted with these standard changes.</p>		
American Electric Power	No	There are substantial reliability issues, as well as additional regulatory, tariff, coordination, and generator and interconnection facility issues, which need to be dealt with before AEP could agree to such requirements. It is not clear that a generator can receive a request for

Organization	Yes or No	Question 1 Comment
		interconnection. We recommend adding qualifier text which states the standard only applies *if* an entity plans to allow such a requested interconnection. This would allow an entity to document that they do not plan to allow such interconnections.
<p><b>Response:</b> Thank you for your comment. In the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities, and the drafting team thinks it is important to clarify the responsibilities related to such a request in NERC’s Reliability Standards. No change made.</p>		
APS	No	Do not agree with adding GO to FAC-001-1
<p><b>Response:</b> Thank you for your comment. The vast majority of stakeholder commenters and the drafting team continue to support the addition of the Generator Owner to the applicability of FAC-001-1. No change made.</p>		
Exelon	No	Exelon does not agree that this standard should be broadly applied to a GO. GOs who do not own a switchyard and whose point of interconnection is a disconnect switch associated with the generator leads prior to the switchyard should be excluded from this standard. If a group of GOs share a generator tie line, then the associated Interconnect Agreement that each of the GO has with the applicable TO and/or TOP should address how these shared connections will effect the system. GOs may not have the resources or expertise to conduct the required interconnect studies to meet this standard
<p><b>Response:</b> Thank you for your comment. The standard does not automatically apply to all Generator Owners; rather, it applies only to those Generator Owners with an executed Agreement to evaluate the reliability impact of interconnecting a third party Facility to the Generator Owner’s existing Facility that is used to interconnect to the Transmission System. The drafting team believes that it has built the appropriate amount of time into the standard to allow an applicable Generator Owner to evaluate the impact of an Interconnect Agreement and obtain or contract for the necessary resources and expertise. Please see the SDT’s accompanying FAC-001-1 technical justification for a more detailed explanation of the team’s rationale. No change made.</p>		
Manitoba Hydro	No	The Applicable Entities now include a Generator Owner that meets the following condition: ‘Generator Owner with an executed Agreement to evaluate the reliability impact of interconnecting another Facility to its existing generation Facility.’ A Generator Owner should not have such power. In many instances Generator Owners do not have the models or expertise to perform interconnection studies to determine if there is an impact on the Transmission Network. All interconnection requests should be implemented by the Transmission Owner (TO) regardless if the interconnection point is within a Generation Owner

Organization	Yes or No	Question 1 Comment
		<p>facility or End-User facility. The TO is in the best position to set unbiased connection requirements to ensure the reliability of the BES is maintained. If a mechanism is created to allow interconnection to a BES line owned by Generator Owner, then it is essential for this Generator Owner providing this interconnection service to be a TO to ensure all reliability standards, including the protection standards, are met so the reliability of the BES is maintained. The drafting team should demonstrate where this situation is occurring. If the redline changes are implemented, could Generator Owner #1 permit Generator Owner #2 to interconnect one of their generators within Generator Owner #1's Facility? Would Generator Owner #2 then need to have an executed Agreement to permit further generator interconnection? From a Transmission Owner viewpoint, it is tough enough to coordinate generator connection queues among adjacent TOs. Having to coordinate with Generator Owners as well would greatly increase the complexity of coordination.</p>
<p><b>Response:</b> Thank you for your comment. In the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities, and the drafting team thinks it is important to clarify the responsibilities related to such a request in NERC's Reliability Standards. No change made.</p>		
American Transmission Company	No	<p>R1 wording in this draft only requires having published Facility connection requirements, but speaks nothing of specific required content of this published document. (R1) VSLs specifically reference R1. If VSLs continue to include assessment of how many R3 (R2 in present standard) requirements are met, a TO potentially has a redundant obligation under two separate requirements. R1 and R3 do not read in a manner consistent with (R1) VSLs. Since R2 only applies to Generator Owners, the (R2) VSL should use "Generator Owner" in place of "responsible entity."</p>
<p><b>Response:</b> Thank you for your comment. The drafting team has removed the second portion of the Severe VSL for R3 to eliminate potential redundancy with the VSLs for R1 and R2. The VSL for R2 now refers to "Generator Owner" rather than "responsible entity."</p>		
Xcel Energy	Yes	<p>We believe it would be helpful to put explanatory wording in that if an entity is already registered as a Transmission Owner and Generator Owner, the Generator Owner portion of that entity would not have to have a separate set of interconnection requirements.</p>
<p><b>Response:</b> Thank you for your comment. The Facility in question in the standard would either be owned by the Generator Owner or the Transmission Owner. The owner must meet the requirement. The SDT does not determine how an entity complies, though we could expect that if an entity is already an Transmission Owner, it could easily simply apply its already existing set of interconnection requirements to any</p>		

Organization	Yes or No	Question 1 Comment
new Facilities that are applicable under this standard.		
Ingleside Cogeneration LP	Yes	However, there may need to be a variance for ERCOT because the Power Generating Companies in ERCOT are not allowed to own transmission assets.
<p><b>Response:</b> Thank you for your comment. If companies in ERCOT are not allowed to own transmission assets, the drafting team assumes that they would also never be in a position to have an Agreement to execute the reliability impact of an interconnection request. No change made.</p>		
Georgia Transmission Corporation	Yes	We commend the drafting team for their efforts to address gaps in Facility Connection Requirements. We believe that the requirements under R3 should be limited to Generator owned equipment to avoid duplication of efforts. A Generator Owner receiving an interconnection request is required to submit an interconnection request to the Transmission Owner which in turn would study the impact of such a request on the Transmission System. Therefore there is no gap as far as the Integrated Transmission System that the third party is interconnecting to through the Generator Owner. However, Generator Owners are responsible for verifying that their equipment is capable of accommodating the interconnection request.
<p><b>Response:</b> Thank you for your comment. The SDT does not believe that R3 is duplicative; there is no reason to assume that the Transmission Owner or the applicable Generator Owner would be addressing anything but the equipment that it owns. No change made.</p>		
BGE	Yes	This change closes the gap in areas not already covered under FAC-003-1 in a continuous improvement effort to ensure vegetation-related transmission reliability for applicable lines.
<p><b>Response:</b> Thank you for your comment.</p>		
FirstEnergy Corp	Yes	FirstEnergy (FE) appreciates the drafting team's careful consideration of the comments made by FE during the most recent informal comment period. The changes made to FAC-001 alleviate FE's prior concern related to a Generator Owner needing to maintain and publish a Facility Connection requirements document regarding facilities which are not yet subject to Open Access provisions. FE supports the team's changes to FAC-001-1 and the concept that a connection requirement document would be required upon the initial or 1st time a Generator Owner executes an Agreement to perform the reliability assessment required in FAC-002-1.
<p><b>Response:</b> Thank you for your comment.</p>		

Organization	Yes or No	Question 1 Comment
Sempra Generation	Yes	Sempra Generation supports the proposal for the compliance obligations under R2 associated with an interconnection request not to be triggered until an interconnection study agreement has been executed.
<b>Response:</b> Thank you for your comment.		
Arizona Public Service Company	Yes	These comments supersede the previous comments submitted by Arizona Public Service Company on July 7, 2011.
<b>Response:</b> Thank you for your comment.		
SERC OC Standards Review Group	Yes	Consider a better definition of what constitutes an “applicable” generator owner or point to the document that explains the definition.
<b>Response:</b> Thank you for your comment. The drafting team attempted to clarify the description of an “applicable” Generator Owner in the latest standards changes.		
Imperial Irrigation District (IID)	Yes	
PacifiCorp	Yes	
Ameren	Yes	
Luminant Power	Yes	
Constellation Power Generation	Yes	
SERC Planning Standards Subcommittee	Yes	
Duke Energy	Yes	



Organization	Yes or No	Question 1 Comment
Tri-State Generation and Transmission, Inc.	Yes	
Electric Market Policy	Yes	
Bonneville Power Administration	Yes	
Indeck Energy Services	Yes	
CHPD	Yes	
BP Wind Energy North America Inc.	Yes	
Independent Electricity System Operator	Yes	
Tacoma Power	Yes	
Northeast Power Coordinating Council	Yes	
TransAlta Centralia Generation LLC	Yes	
EPSA		<p>Background: The Electric Power Supply Association (EPSA) endorsed the initial recommendations of the Ad Hoc Group for Generator Requirements at the Transmission Interface, offered informal comments on the March 2011 White Paper Proposal for Project 2010-07 and now appreciates this opportunity to provide comments on the questions posted June 17, 2011. Since NERC's creation of the "GOTO Team" in February of 2009, EPSA has supported the efforts of Ad-Hoc Group and now the Project 2010-07 Standards Drafting Team (SDT). While EPSA members' compliance registration includes several functional entity types, the bulk of competitive suppliers' registrations are as Generator Owners (GOs) and Generator</p>

Organization	Yes or No	Question 1 Comment
		<p>Operators (GOPs).</p> <p>EPSA applauds the SDT’s decision to recommend the use the “intent of obligation” as the reason for application of FAC-001 rather than the receipt of request for interconnection and thereby supports the revisions to FAC-001-1. The proposed modification to FAC-001 (a new R2) would require a GO to develop “Facility connection requirements” within “45 days of executing an Agreement to evaluate the reliability impact of interconnecting another Facility to its existing generation Facility...” The use of the agreement execution is a more reasonable triggering mechanism for FAC-001 application and compliance. The SDT’s recommendation intentionally excluded specific reference to the form of agreement to avoid commingling commercial and reliability aspects in reliability standards.</p> <p>However, the existing language may still may mix commercial and reliability issues. The accompanying project Background Resource Document (p.2) makes it clear that the interconnection to an existing generator facility is contemplated to be the “existing interconnecting Facility that is owned by a generator” - that is, the generator’s lead. The generator’s leads are considered part of the “existing generator Facility,” however, the generator, step-up transformer and other equipment that is within the generator switchyard can also be considered part of the Facility. FERC requires all transmission facilities to be available for “open access.” A generator lead would become open access if another customer interconnected to it. Therefore FAC-001-1 could be made clearer by modifying the language regarding the 45-day trigger as follows: within “45 days of executing an Agreement to evaluate the reliability impact of interconnecting another Facility to its the Generator Owner’s existing generation interconnecting transmission Facilities...” This modification would make it clear that the requirement does not apply to an entity that wants to, for example, connect a new generator within the fenced-in site of the existing generator, but instead only applies to request to interconnect to the generator lead.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team has attempted to make this clarification regarding the “activation” of the applicability of this standard with respect to Generator Owners.</p>		
Utility Services, Inc.		
LG&E and KU Energy		

Organization	Yes or No	Question 1 Comment
Wisconsin Electric		

**2. Do you support the one year compliance timeframe for Generator Owners as proposed in the Implementation Plan for FAC-001-1?**

**Summary Consideration:** Most commenters supported the one year compliance timeframe for Generator Owners as proposed in the Implementation Plan for FAC-001-1. A few suggested a longer timeframe, but the drafting team believes it has built in the appropriate amount of time by giving a year in the implementation plan and then waiting to “activate” the standard until a Generator Owner has an executed Agreement to evaluate the reliability impact of the interconnection request.

Organization	Yes or No	Question 2 Comment
Manitoba Hydro	No	See question #1 comments. We do not support changing the applicability of FAC-001-1 to include Generator Owners ‘with an executed Agreement’ or Generator Owners that own BES transmission.
<b>Response:</b> Thank you for your comment. Please see our response to your Question 1 comments above.		
Ingleside Cogeneration LP	No	As drafted, the document still refers to generation interconnection lines as transmission lines in critical places. We understand that the SDT has taken significant steps to minimize this in both FAC-001 and FAC-003 and has had discussions with NERC about not registering GOs as TOs; however, this lack of distinction between high voltage generation interconnection lines and actual transmission lines still presents a difficult situation for Generations Owners and a source of contention with Reliability Entities. This could be resolved somewhat by using the non-defined term “generation interconnection lines” in place of “transmission lines” in, for example, section 4.3.1. Since the term “transmission line” is also undefined, this would seem to be a reasonable approach.
<b>Response:</b> Thank you for your comment. We have provided a disclaimer about the use of the term “transmission lines” in FAC-003, and have avoided use of the term elsewhere.		
APS	No	Leave the GO out of the standard.
<b>Response:</b> Thank you for your comment. In the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities, and the drafting		

Organization	Yes or No	Question 2 Comment
<p>team thinks it is important to clarify the responsibilities related to such a request in NERC's Reliability Standards by including applicable Generator Owners in FAC-001-1.</p>		
SERC OC Standards Review Group	No	We feel that an 18 month implementation plan would be more conducive for generators to meet these new requirements
<p><b>Response:</b> Thank you for your comment. The drafting team believes it has built in an adequate amount of time by giving a year in the implementation plan and then waiting to "activate" the standard until a Generator Owner has an executed Agreement to evaluate the reliability impact of the interconnection request.</p>		
PPL Supply Group	No	It may take longer since very few (if any) GOs are prepared to perform this type of work.
<p><b>Response:</b> Thank you for your comment. The drafting team believes it has built in the appropriate amount of time by giving a year in the implementation plan and then waiting to "activate" the standard until a Generator Owner has an executed Agreement to evaluate the reliability impact of the interconnection request.</p>		
BGE	Yes	This requirement is consistent with the initial time frame when FAC-003-1 was first implemented.
<p><b>Response:</b> Thank you for your comment.</p>		
Southern Company	Yes	However, we do not believe it is necessary to require a GO to have Facility connection requirements as we discuss in our response to Question 1.
<p><b>Response:</b> Thank you for your comment. Please see our response to your Question 1 comments above.</p>		
FirstEnergy Corp	Yes	The one year lead time is sufficient lead-time to notice the GOs of new expectations required under FAC-001-1.
<p><b>Response:</b> Thank you for your comment.</p>		
Northeast Power Coordinating	Yes	

Organization	Yes or No	Question 2 Comment
Council		
Midwest Reliability Organization's NERC Standards Review Forum (NSRF)	Yes	
Electric Market Policy	Yes	
SERC Planning Standards Subcommittee	Yes	
Imperial Irrigation District (IID)	Yes	
Public Service Enterprise Group	Yes	
SPP Reliability Standards Development Team	Yes	
ACES Power Members	Yes	
Bonneville Power Administration	Yes	
EPSA	Yes	
PacifiCorp	Yes	
Arizona Public Service Company	Yes	

Organization	Yes or No	Question 2 Comment
Westar Energy	Yes	
Luminant Power	Yes	
American Electric Power	Yes	
BP Wind Energy North America Inc.	Yes	
Sempra Generation	Yes	
Tri-State Generation and Transmission, Inc.	Yes	
Xcel Energy	Yes	
Tacoma Power	Yes	
Duke Energy	Yes	
Constellation Power Generation	Yes	
Ameren	Yes	
Indeck Energy Services	Yes	
CHPD	Yes	
Independent Electricity System Operator	Yes	

Organization	Yes or No	Question 2 Comment
TransAlta Centralia Generation LLC	Yes	
Georgia Transmission Corporation		
Wisconsin Electric		
Utility Services, Inc.		
Exelom		
LG&E and KU Energy		
American Transmission Company		



**3. Taking into consideration that only one of the versions of FAC-003 will actually be implemented, a decision that will be made as the Project 2010-07 drafting team learns more about the status of Project 2007-07—Vegetation Management, do you support the proposed redline changes to FAC-003-X and FAC-003-3?**

**Summary Consideration:** The SDT thanks all individuals and groups who provided feedback. The majority of comments indicated support for the SDT’s changes to FAC-003-X and FAC-003-3, and the drafting team made additional changes, based on commenter feedback, where the team believes those changes add clarity.

Many commenters focused on the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: “...that extends greater than one mile beyond the fenced area of the generating station switchyard...” The drafting team believes that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, the team maintains that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.

One commenter caught typos in the Effective Dates sections of the standards, and those typos have been corrected.

Single commenters brought up minority issues, but the SDT found no justification for these issues. We address those minority issues in our responses to the specific comments below.

Organization	Yes or No	Question 3 Comment
American Transmission Company	No	<p>ATC does not support the changes for FAC-003-X, however, ATC does support FAC-003-3.</p> <p>FAC-003-X Concerns. The VRF and VSL tables do not correlate to the original FAC-003-1 levels of non-compliance section D.2. ATC believes that section D.2 should be rewritten to align with the already approved FAC-003-1.</p> <p>FAC-003-X Corrections- Applicability Section 4.3.1, sentence 3 - Transmission should not be capitalized.</p>

Organization	Yes or No	Question 3 Comment
		FAC-003-3 - No Concerns
<p><b>Response:</b> Thank you for your comment. The VSLs and VRFs in FAC-003-X were taken from already approved NERC projects to update all early versions of standards with VSLs and VRFs instead of levels of non-compliance. Any additional changes to those VSLs and VRFs would be beyond the scope of this drafting team. No change made.</p> <p>Applicability Section 4.3.1 no longer includes a capitalized version of Transmission (just a reference to the “Transmission Owner’s Facility”).</p>		
Public Service Enterprise Group	No	<p>FAC-003-X and FAC-003-3 both have similar “one half mile” language, the starting point for the one half mile is vague. In FAC-003-X, the language in 4.3.1 reads “Generator Owner that owns an overhead Facility that extends greater than one half mile beyond the fenced area of the switchyard, generating station or generating substation up to the point of interconnection with the Transmission system and ...” While we support the one half mile language, there are three possible starting points for the measurement of the one half mile: beyond the fenced area of (i) the switchyard, (ii) the generating station, or (iii) the generation substation. While a GO’s fencing policy may differ between generation stations, the requirement to implement vegetation management should be clear. For clarity, while we believe that the language should retain flexibility with regards to “fencing” by the Generator Owner, it should be clear that the Generation Owner determines the starting point.</p> <p>Second, a Generator Owner’s overhead Facility that is within the fence should explicitly not be applicable to the standard. Finally, we believe the language that refers to the “interconnection with the Transmission system” should be changed to “interconnection with a Transmission Owner’s Facility. The reason is that the term “Transmission” which is defined in the NERC Glossary could be construed to include all of a Generator Owner’s interconnection leads. (The definition is excerpted from the Glossary in our response to question 7) Therefore, we suggest that the language in 4.3.1 be modified as follows to make all of these points clear: A Generator Owner that owns an overhead Facility that extends greater than one half mile beyond the fenced area of either the generator switchyard, generating station or generating substation (as specified by the Generation Owner) up to the point of interconnection with</p>

Organization	Yes or No	Question 3 Comment
		<p>a Transmission Owner’s Facility and is operated 200 kV and above and any lower voltage lines designated by the RE as critical to the reliability of the electric system within the region is applicable to this standard.”</p>
<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: “...that extends greater than one mile beyond the fenced area of the generating station switchyard...” We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p> <p>The drafting team agrees that “interconnection with a Transmission Owner’s Facility” adds clarity. That change has been made.</p>		
<p>SPP Reliability Standards Development Team</p>	<p>No</p>	<p>In both FAC-003-3 and FAC-003-X it lists “greater than one half mile cutoff”. We would recommend that the distance cutoff be removed. We feel that overhead Facilities shouldn’t be treated any differently than any other. Also we would like to see these two sections in both standard proposals reflect similar language for 4.3.1.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: “...that extends greater than one mile beyond the fenced area of the generating station switchyard...” We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p>		

Organization	Yes or No	Question 3 Comment
PPL Supply Group	No	<p>Version 3 (based on V2): Third Effective date appears to contain a typographical error.</p> <p>Version X (based on V1): Same as Version 3 comments.</p> <p>Please consider streamlining the section Background (Version 3).</p>
<p><b>Response:</b> Thank you for your comment. The typographical errors were corrected in both versions of the standard. Streamlining the Background section in Version 3 is not within the scope of this drafting team. No change made.</p>		
Westar Energy	No	<p>The language in the applicability section 4.3.1 in both FAC-003-3 and FAC-003-X states "extends greater than one half mile beyond..." We propose that the SDT consider removing the distance exclusion to be consistent with language for Transmission Owner Facilities and treat all overhead facilities the same.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p>		
Southern Company	No	<p>(1) We question whether R1 of FAC-003-3 would ever apply to a GO who owns transmission interconnection equipment. Can the SDT provide an example or two in the Guideline and Technical Basis section of the standard?</p> <p>(2) We recommend rearranging the language in R5 of FAC-003-3 to state, "The applicable Transmission Owner or applicable Generator Owner shall take corrective action to ensure continued vegetation management to prevent encroachments when..." This places the "shall" at the beginning of the</p>

Organization	Yes or No	Question 3 Comment
		<p>requirement which is clearer and consistent with the structure of the other requirements.</p> <p>(3) We question why there are no VSLs assigned to R4. Should there be? What are the consequences if a Regional Entity does not comply?</p> <p>(4) There does not appear to be any coordination with the Vegetation Management Standard Drafting Team (VMSDT) concerning proposed modifications to the standard. The VMSDT should be consulted.</p>
<p><b>Response:</b> Thank you for your comment.</p> <p>(1) The SDT is not currently aware of specific examples where R1 would apply, but we do not see any reason to remove that reference, as it could apply in the future. If we removed it now, we'd create a reliability gap, but if we leave it in, no Generator Owner has to take action unless it has an IROL or WECC transfer path.</p> <p>(2) This change is beyond the scope of our drafting team. It is an issue that should have been addressed under Project 2007-07. We will submit the issue in a Suggestion Form to be added to NERC's Issues Database.</p> <p>(3) Because the Regional Entity is not a Functional Entity, it cannot be assigned penalties under NERC's Reliability Standards.</p> <p>(4) The Project 2007-07 Vegetation Management drafting team's latest draft standard has already passed ballot, so coordination with that team was no longer a possibility.</p>		
APS	No	Leave the GO out of both Standards proposed.
<p><b>Response:</b> Thank you for your comment. The drafting team and the majority of stakeholder commenters support making both FAC-001 and FAC-003 applicable to Generator Owners to ensure that all Generator Owner responsibilities at the generator interconnection Facility are covered under NERC Reliability Standards. No change made.</p>		
Indeck Energy Services	No	4.3.1.3 is a regional variation. The ROP doesn't permit members of one region to vote on regional requirements for another region. A separate regional standard will be required.
<p><b>Response:</b> Thank you for your comment. It is our understanding that any stakeholder can vote on regional requirements as long as they're in the body of the standard. This does not require a separate regional standard.</p>		

Organization	Yes or No	Question 3 Comment
Ingleside Cogeneration LP	No	<p>Ingleside Cogeneration LP believes there should be a relaxation in the vegetation management requirements for those interconnections which only serve as a radial link to the BES. Although we fully understand the importance of keeping vegetation away from high voltage lines, the one year period is much too frequent in our generator locations. The added documentation and other expenses simply do not justify the non-existent gain in reliability when vegetation in a locale (e.g.; desert) never reaches five feet above the ground. Consider limiting this exception to units below a certain MVA rating that are not critical to the BES - perhaps coupled with evidence that vegetative intrusions are highly unlikely.</p>
<p><b>Response:</b> Thank you for your comment. We have attempted to set up a reasonable qualifier/balance with the new one mile designation and “stake in the ground” at the fenced line of the switchyard. Because of a perceived reliability gap at the interconnection between Generator Owner Facilities and Transmission Owner Facilities, we are doing our best to apply the same Transmission Owner vegetation management requirements to the Generator Owner. This issue you raise (with respect to the vegetation in certain locales) could possibly be applied to other entities besides the Generator Owner if it was technically justified, so the drafting team encourages you to submit a SAR suggesting this.</p>		
Notheast Power Coordinating Council	No	See comments in the following questions.
EPSA	Yes	<p>EPSA generally supports the SDT’s proposed redline changes to FAC-003-X and FAC-003-3 and SDT’s diligence in monitoring Project 2007-07. There is one distinction however that EPSA would like to bring to the SDT’s attention that could increase clarity. FAC-003-X and FAC-003-3 both have similar “one half mile” language, but the starting point for the one half mile can occur one of three ways.</p> <p>In FAC-003-X, the language in 4.3.1 reads “Generator Owner that owns an overhead Facility that extends greater than one half mile beyond the fenced area of the switchyard, generating station or generating substation up to the point of interconnection with the Transmission system and ...” Therefore, there are three possible starting points for the measurement of the one half mile: beyond the fenced area of (i) the switchyard, (ii) the generating station,</p>

Organization	Yes or No	Question 3 Comment
		<p>or (iii) the generation substation. While it would appear implicit that GO's would determine which of the three was used to make the determination that the GO determines the starting point.</p> <p>Another point for consideration is that a Generator Owner's overhead Facility that is within the fence should explicitly not be applicable to the standard. EPSA believes the language that refers to the "interconnection with the Transmission system" should be changed to "interconnection with a Transmission Owner's Facility. The reason is that the term "Transmission" which is defined in the NERC Glossary could be construed to include all of a Generator Owner's interconnection leads. Therefore, we suggest that the language in 4.3.1 be modified as follows to make all of these points clear: A Generator Owner that owns an overhead Facility that extends greater than one half mile beyond the fenced area of either the generator switchyard, generating station or generating substation (as specified by the Generation Owner) up to the point of interconnection with the Transmission Owner's Facility and is operated 200 kV and above and any lower voltage lines designated by the RE as critical to the reliability of the electric system within the region is applicable to this standard."</p>
<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p> <p>The drafting team agrees that "interconnection with a Transmission Owner's Facility" adds clarity. That change has been made.</p>		

Organization	Yes or No	Question 3 Comment
BGE	Yes	As noted in Question-1 above.
<b>Response:</b> Thank you for your comment. See our response to Question 1.		
SERC OC Standards Review Group	Yes	
Midwest Reliability Organization's NERC Standards Review Forum (NSRF)	Yes	
Electric Market Policy	Yes	
SERC Planning Standards Subcommittee	Yes	
Imperial Irrigation District (IID)	Yes	
ACES Power Members	Yes	
Bonneville Power Administration	Yes	
PacifiCorp	Yes	
Arizona Public Service Company	Yes	
Luminant Power	Yes	



Organization	Yes or No	Question 3 Comment
American Electric Power	Yes	
BP Wind Energy North America Inc.	Yes	
Sempra Generation	Yes	
Tri-State Generation and Transmission, Inc.	Yes	
Xcel Energy	Yes	
Georgia Transmission Corporation	Yes	
Exelom	Yes	
Duke Energy	Yes	
Constellation Power Generation	Yes	
Ameren	Yes	
CHPD	Yes	
Independent Electricity System Operator	Yes	
FirstEnergy Corp	Yes	
TransAlta Centralia	Yes	

Organization	Yes or No	Question 3 Comment
Generation LLC		
LG&E and KU Energy		
Manitoba Hydro		
Tacoma Power		
Wisconsin Electric		
Utility Services, Inc.		

4. The drafting team has added Generator Owners to the Applicability sections of FAC-003-X and FAC-003-3 with the qualifier that the included lines “extend greater than one half mile beyond the fenced area of the switchyard, generating station or generating substation up to the point of interconnection with the Transmission system.” The team received many comments about the need to define a distance rather than other measures for exclusion, and decided on the one half mile as a reasonable distance. Do you agree with this half-mile qualifier?

**Summary Consideration:** The SDT thanks all individuals and groups who provided feedback. The majority of comments indicated support for the SDT’s changes to FAC-003-X and FAC-003-3, and the drafting team has made additional changes, based on commenter feedback, where they think those changes add clarity.

The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: “...that extends greater than one mile beyond the fenced area of the generating station switchyard...” The SDT believes that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, the team maintains that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.

One commenter suggesting including the equivalent kilometer length in the qualifying language in the standard, and we have made that change.

Organization	Yes or No	Question 4 Comment
Northeast Power Coordinating Council	No	The qualifier should be similar to that specified in Part 4.2.4 of FAC-003-3: “This standard applies to overhead transmission lines identified above (4.2.1 through 4.2.3) located outside the fenced area of the switchyard, station or substation and any portion of the span of the transmission line that is crossing the substation fence. “ Vegetation needing attention can exist within a half mile of a switchyard. Vegetation does not discriminate between Generation and Transmission Owners.

**Response:** Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-

Organization	Yes or No	Question 4 Comment
		<p>X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p>
<p>SPP Reliability Standards Development Team</p>	<p>No</p>	<p>See comment above. We feel like there is no need for using a distance exclusion.</p>
		<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p>
<p>PPL Supply Group</p>	<p>No</p>	<p>Version 3 (based on V2):Comments: Although the "one half mile" is much clearer than "two spans", what is the rationale for choosing ½ mile as opposed to another length such as 1 or 2 miles? Version X (based on V1): Same as Version 3 comments</p>
		<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of</p>

Organization	Yes or No	Question 4 Comment
		the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.
Bonneville Power Administration	No	BPA believes that there needs to be a clear demarcation where Transmission Owner and Generator Owner responsibilities begin and end.
		<b>Response:</b> Thank you for your comment. The drafting team is operating under the assumption the Generator Owner’s responsibilities to its interconnection Facility up to the point of interconnection with the Transmission Owner’s Facility, and we have attempted to make that clear in our draft standards. We are considering changes to the definitions of Generator Owner and Generator Operator, or creation of new terms to provide additional clarity in the next steps of our project plan, pending Standards Committee approval.
Arizona Public Service Company	No	The generator should be responsible no matter the length from fence area to the point of interconnection.
		<b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: “...that extends greater than one mile beyond the fenced area of the generating station switchyard...” We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.
Southern Company	No	We agree with a one-half mile line as being “within the Generator Owner’s line of sight and could be visually monitored for vegetation conditions on a routine basis.” However, we suggest that some generation interconnection Facilities greater than ½ mile in length could also fall within the GO’s line of sight or be constructed such that they should be considered for exemption. Thus, the Task Force should consider including exclusions for longer generator tie lines if

Organization	Yes or No	Question 4 Comment
		<p>the GO can provide sufficient justification. Examples of justifications could include (1) a clear line of sight, (2) pavement, gravel, or other non-vegetation covered path, or (3) routine monitoring is performed from a roadway parallel to the line, etc. Do not obviate any other transmission requirements such as the following (which are incorporate into the draft standard): i. Operated at 200kV or higher; or ii. Operated below 200kV and included in IROL; or iii. Operated below 200kV and inclusion in a Major WECC Transfer Path</p>
<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p> <p>The issue you raise with respect to justification for further exclusions could possibly be applied to other entities besides the Generator Owner (assuming it was technically justified), so the drafting team encourages you to submit a SAR suggesting this.</p>		
APS	No	Leave GOs out of the standards.
<p><b>Response:</b> Thank you for your comment. The drafting team and the majority of stakeholder commenters support making both FAC-001 and FAC-003 applicable to Generator Owners to ensure that all Generator Owner responsibilities at the generator interconnection Facility are covered under NERC Reliability Standards. No change made.</p>		
Ingleside Cogeneration LP	No	<p>The SDT needs to clarify that the one-half mile distance is measured from the property line of the Generation Owner, i.e., an interconnection line that is in a ROW. In addition, the half mile qualifier makes sense only for those interconnections into critical generation facilities. See our response under Question #3.</p>

Organization	Yes or No	Question 4 Comment
<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p>		
Wisconsin Electric	No	In addition to the "greater than one-half mile" criteria, we maintain there should also be an exclusion for lines up to one mile in length which are entirely on the Generator Owner's property.
<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p>		
Ameren	No	(1)We do not agree there should be a ½ mile exemption. On what legitimate basis could we say the first ½ mile is not important? (2) There may be different usage of the term "point of interconnection" in the industry. We suggest the SDT to consider proposing a formal definition of this term.
<p><b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others</p>		

Organization	Yes or No	Question 4 Comment
<p>found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p> <p>The drafting team is considering proposing a formal definition of the term "point of interconnection," or other definitional changes to make the use of that term clearer.</p>		
Westar Energy	No	
Midwest Reliability Organization's NERC Standards Review Forum (NSRF)	Yes	<p>Although the NSRF agrees with the 1/2 mile criteria (see question 1); we believe the drafting team will have to develop additional justification for this criteria given FERC's recent orders, RC11-1 and RC11-2 (see question 6 for full FERC Order details). In these orders FERC "implies" that if the GO/GOP is responsible for a breaker operated at 100kV or higher the entity should be required to register as a TOP/TO. Therefore it appears FERC would not be inclined to provide any leeway based on distance from the substation. The SDT should note that the FERC Order points to this Project to "address matters involving reliability obligations at the interface of the transmission grid", which is foot note 58.</p>
<p><b>Response:</b> Thank you for your comment.</p>		
SERC Planning Standards Subcommittee	Yes	<p>However, we are concerned that there may be a reliability gap for locations where there is not a half-mile line-of-sight from the generation switchyard.</p>
<p><b>Response:</b> Thank you for your comment. The SDT believes these cases are limited enough that an exclusion within the standard is not necessary. If you believe it is, we encourage you submit to a <a href="#">Suggestion Form</a>.</p>		
EPSA	Yes	<p>EPSA appreciates the SDT proposing to use the approach that provides a</p>



Organization	Yes or No	Question 4 Comment
		specific distance for determining which GO Facility lead lines that FAC-003 should apply to. EPSA agrees that the half-mile qualifier provides a discrete parameter that will limit ambiguity in the Standard.
<b>Response:</b> Thank you for your comment.		
LG&E and KU Energy	Yes	Although the "one half mile" is much clearer than "two spans", what is the rationale for choosing ½ mile as opposed to another length such as 1 or 2 miles?
<b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.		
Independent Electricity System Operator	Yes	We generally agree with the proposed distance. However, we suggest that in Applicability Section 4.3.1 of the two draft standards, an equivalent kilometer value be inserted after the "one half mile".
<b>Response:</b> Thank you for your comment. We have added the equivalent kilometer value.		
SERC OC Standards Review Group	Yes	While we agree, we believe that a better explanation of "the fenced area of the switchyard, generating station or generating substation up to the point of interconnection with the Transmission system" should be included. One suggestion is to distinguish between a plant perimeter fence and an internal switchyard fence.
<b>Response:</b> Thank you for your comment. The drafting team received many comments about the half-mile qualifier in FAC-		

Organization	Yes or No	Question 4 Comment
<p>003-X and FAC-003-3. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.</p>		
BGE	Yes	1/2 mile is a distance that can generally be viewed from one location, e.g. the switchyard, and can be construed to present minimal risk since switchyards have a reasonably frequent personnel presence that could be expected to notice vegetation issues in the <1/2 mile area.
<p><b>Response:</b> Thank you for your comment.</p>		
Electric Market Policy	Yes	
Imperial Irrigation District (IID)	Yes	
Public Service Enterprise Group	Yes	
ACES Power Members	Yes	
PacifiCorp	Yes	
Luminant Power	Yes	
American Electric Power	Yes	

Organization	Yes or No	Question 4 Comment
Xcel Energy	Yes	
Sempra Generation	Yes	
Tri-State Generation and Transmission, Inc.	Yes	
BP Wind Energy North America Inc.	Yes	
Georgia Transmission Corporation	Yes	
Exelom	Yes	
FirstEnergy Corp	Yes	
TransAlta Centralia Generation LLC	Yes	
Duke Energy	Yes	
Indeck Energy Services	Yes	
Constellation Power Generation	Yes	
CHPD	Yes	
Utility Services, Inc.		
Manitoba Hydro		

<b>Organization</b>	<b>Yes or No</b>	<b>Question 4 Comment</b>
Tacoma Power		
American Transmission Company		

**5. Do you support the two year compliance timeframe for Generator Owners as included and explained in the Implementation Plans for FAC-003-X and FAC-003-3?**

**Summary Consideration:** The SDT thanks all individuals and groups who provided feedback. The vast majority of commenters supported the two-year compliance timeframe for Generator Owners as included and explained in the Implementation Plan. One commenter suggested that one year would be sufficient because most lines will be short, but the SDT pointed out that the distances of the lines can vary, and Generator Owners that have not been practicing any sort of vegetation management will need to hire new staff and develop a full vegetation management plan, which could take longer than the year given to Transmission Owners for implementation of FAC-003-1. No changes were made to the two-year compliance timeframe, although the team has modified FAC-003-3's implementation plan to account for a few different scenarios that could occur with respect to the filing of FAC-003-2 and FAC-003-3

Organization	Yes or No	Question 5 Comment
Ingleside Cogeneration LP	No	The two year compliance time frame makes sense only for those GOs who own interconnections into critical generation facilities. See our response under Question #3.
<p><b>Response:</b> Thank you for your comment. It is unclear whether you find the two year timeframe too long or too short, or if you believe that the standard should only apply to Generator Owners who own interconnections into critical generation facilities. No change made.</p> <p>Please see our response to your comments under Question 3 above.</p>		
APS	No	Leave GOs out of the standards.
<p><b>Response:</b> Thank you for your comment. The drafting team and the majority of stakeholder commenters support making both FAC-001 and FAC-003 applicable to Generator Owners to ensure that all Generator Owner responsibilities at the generator interconnection Facility are covered under NERC Reliability Standards. No change made.</p>		
Arizona Public Service Company	No	The generator should be able to be in compliance within one year since the distance of line miles is small.
<p><b>Response:</b> Thank you for your comment. The distances of the lines can vary, and Generator Owners that have not been practicing any sort of vegetation management will need to hire new staff and develop a full vegetation management plan, which could take</p>		

Organization	Yes or No	Question 5 Comment
longer than the year given to Transmission Owners for implementation of FAC-003-1. No change made.		
Northeast Power Coordinating Council	Yes	
SERC OC Standards Review Group	Yes	
Midwest Reliability Organization's NERC Standards Review Forum (NSRF)	Yes	
Electric Market Policy	Yes	
SERC Planning Standards Subcommittee	Yes	
Imperial Irrigation District (IID)	Yes	
Public Service Enterprise Group	Yes	
SPP Reliability Standards Development Team	Yes	
PPL Supply Group	Yes	
ACES Power Members	Yes	
Bonneville Power Administration	Yes	

Organization	Yes or No	Question 5 Comment
EPSA	Yes	
PacifiCorp	Yes	
Westar Energy	Yes	
Southern Company	Yes	
Luminant Power	Yes	
American Electric Power	Yes	
BP Wind Energy North America Inc.	Yes	
Sempra Generation	Yes	
Tri-State Generation and Transmission, Inc.	Yes	
Xcel Energy	Yes	
Georgia Transmission Corporation	Yes	
BGE	Yes	No comment.
Exelom	Yes	
Wisconsin Electric	Yes	
Duke Energy	Yes	

Organization	Yes or No	Question 5 Comment
Constellation Power Generation	Yes	
Ameren	Yes	
Indeck Energy Services	Yes	
CHPD	Yes	
Independent Electricity System Operator	Yes	
FirstEnergy Corp	Yes	
TransAlta Centralia Generation LLC	Yes	
Utility Services, Inc.		
LG&E and KU Energy		
Tacoma Power		
Manitoba Hydro		
American Transmission Company		



6. In its background resource document, the drafting team lists the standards that it has not modified, and offers rationale for its decisions. Are there any reliability standards or requirements that you believe should apply to Generator Owners or Generator Operators that own and are responsible for the operation of an overhead Facility, that are not already applicable or have been proposed to be applicable (FAC-001 and FAC-003) by the Project 2010-07 drafting team? If so, please list them and offer an explanation as to why they should be applicable to that entity.

**Summary Consideration:** The SDT thanks all stakeholders for their feedback. The majority of commenters did not suggest the addition of any standards or requirements to the team’s scope of work, and a few commenters cautioned strongly against any additions. Some commenters suggested that the team consider including those standards and requirements listed in the June 2011 Cedar Creek and Milford FERC orders. The drafting team has considered the inclusion of the requirements listed in the Cedar Creek and Milford orders in the past, and has been revisiting them throughout our process. They have continued to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing their rationale (at every stage of the process) for not including additional standards or requirements. The team has elected to propose a slight clarifying change in PRC-004-2, but no changes to the applicability of that or any other standard.

While the SDT will not be adding standards at this time because they do not believe such additions are technically justified or justified by stakeholder comments, the team will be seeking some additional informal feedback from industry groups to ensure that their technical justifications are sound and supported by others outside of the drafting team. The team has posted their current draft rationale and technical justification documents on the project webpage with this posting. If you have any specific feedback on these documents, you are welcome to email [mallory.huggins@nerc.net](mailto:mallory.huggins@nerc.net).

Organization	Yes or No	Question 6 Comment
Manitoba Hydro	No	The direction of the background resource document gives special treatment to the Generator Owner in that it allows the Generator Owner TO status for a couple of standards (FAC-001 and FAC-003), but exempts the Generator Owner from many of the standards applicable to a TO. The NERC Functional Model defines the various functional entities. If a Generator Owner wants to be a TO, all the Requirements applicable to a TO should apply. There is no need to change specific Reliability Standards to allow the

Organization	Yes or No	Question 6 Comment
		Generator Owner to perform only selected TO functions.
<p><b>Response:</b> Thank you for your comment. The purpose of the drafting team is “To propose a set of changes to existing requirements and definitions, as well as additional requirements and definitions, that collectively adds significant clarity to Generator Owners and Generator Operators regarding their reliability standard obligations at the interface with the interconnected grid. This global strategy is proposed to expedite the closing of the reliability gap.” The SDT is applying select Transmission Owner standards to Generator Owners, not attempting to give them TO status.</p>		
Sempra Generation	No	No, Sempra Generation believes the Project 2010-07 Team has effectively indentified the Standards and Requirements that should apply to Generator Owners or Generator Operators that own, and are responsible for, the operation of an overhead Facility, that are not already applicable or have been proposed to be applicable.
<p><b>Response:</b> Thank you for your comment.</p>		
APS	No	Leave GOs and GOPs out of the FAC-001 and FAC-003 standards.
<p><b>Response:</b> Thank you for your comment. The drafting team and the majority of stakeholder commenters support making both FAC-001 and FAC-003 applicable to Generator Owners to ensure that all Generator Owner responsibilities at the generator interconnection Facility are covered under NERC Reliability Standards. No change made.</p>		
SERC OC Standards Review Group	No	
Electric Market Policy	No	
SERC Planning Standards Subcommittee	No	
Imperial Irrigation District (IID)	No	
SPP Reliability Standards	No	

Organization	Yes or No	Question 6 Comment
Development Team		
ACES Power Members	No	
EPSA	No	
PacifiCorp	No	
Arizona Public Service Company	No	
Westar Energy	No	
Luminant Power	No	
American Electric Power	No	
BP Wind Energy North America Inc.	No	
Tri-State Generation and Transmission, Inc.	No	
Xcel Energy	No	
Georgia Transmission Corporation	No	
BGE	No	No comment.
Exelom	No	

Organization	Yes or No	Question 6 Comment
Ingleside Cogeneration LP	No	
Wisconsin Electric	No	
Duke Energy	No	
Constellation Power Generation	No	
Ameren	No	
Indeck Energy Services	No	
CHPD	No	
Independent Electricity System Operator	No	
FirstEnergy Corp	No	
TransAlta Centralia Generation LLC	No	
Public Service Enterprise Group	Yes	<p>FERC's Cedar Creek and Milford order (issued on June 16, 2011 and that is posted at <a href="http://www.nerc.com/files/Order_Denying_Appeals_RC11-1_RC11-2_20110616.pdf">http://www.nerc.com/files/Order_Denying_Appeals_RC11-1_RC11-2_20110616.pdf</a>) listed several standards (in Paragraphs 71 and 87) that should be applicable to Cedar Creek and Milford, respectively. Because of this order, the drafting team should examine the listed standards and determine whether they are or are not applicable to Generator Owners or Generator Operators that own and are responsible for the operation of an overhead Facility. We emphasize that our recommendation takes no position on any legal issues regarding the referenced order.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team has considered the inclusion of the requirements listed in the Cedar</p>		

Organization	Yes or No	Question 6 Comment
		<p>Creek and Milford orders in the past, and we have been revisiting them throughout our process. We continue to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including additional standards or requirements. We have elected to propose a slight clarifying change in PRC-004-2, but no changes to the applicability of that or any other standard. Please see the accompanying resource documents for more information.</p>
<p>Midwest Reliability Organization's NERC Standards Review Forum (NSRF)</p>	<p>Yes</p>	<p>In FERC order "Denying Appeals of Electric Reliability Organization Registration Determinations" dated June 16, 2011 (RC11-1 and RC11-2) FERC explicitly stated compliance GAPs existed with the following standards at a minimum: o FAC-011, Requirements R2, R2.1, R2.2. o PRC-001-1, Requirements R2, R2.2, R4; o PRC-004-1 Requirement R1; o TOP-004-2, Requirements R6, R6.1, R6.2, R6.3, R6.4; o PER-003-1, Requirements R1, R1.1, R1.2; o FAC-003-1, Requirements R1, R2; o TOP-001, Requirement R1 and o FAC-014-2, Requirement R2. When a GO/GOP owns transmission equipment but is not registered as a TO or TOP. The drafting team should explicitly address each of these the above requirements.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team has considered the inclusion of the requirements listed in the Cedar Creek and Milford orders in the past, and we have been revisiting them throughout our process. We continue to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including additional standards or requirements. We have elected to propose a slight clarifying change in PRC-004-2, but no changes to the applicability of that or any other standard. Please see the accompanying resource documents for more information.</p>		
<p>Tacoma Power</p>	<p>Yes</p>	<p>Tacoma Power suggests that three standards be reconsidered for inclusion in this Project, to include the Generator Owner and/or Operator: EOP-005, more directly responsible for participation in restoration plans; PER-002, responsible for training; and VAR-001.</p>
<p><b>Response:</b> Thank you for your comment. We have considered the inclusion of additional standards and requirements throughout our process and we continue to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including</p>		

Organization	Yes or No	Question 6 Comment
<p>additional standards or requirements. We have elected to propose a slight clarifying change in PRC-004-2, but no changes to the applicability of that or any other standard. Please see the accompanying resource documents for more information. The SDT does not agree that VAR-001 should be applied to a GOP as VAR-002 @R2 already requires the GOP to “maintain the generator voltage or Reactive Power output (within applicable Facility Ratings) as directed by the Transmission Operator.” We believe this is sufficient in meeting the purpose of VAR-001.</p>		
Southern Company	Yes	Please see our Comments in response to Question 7.
Bonneville Power Administration	Yes	
PPL Supply Group		
Northeast Power Coordinating Council		
LG&E and KU Energy		
Utility Services, Inc.		
American Transmission Company		

**7. Do you have any other questions or concerns with the proposed standards or with the background resource document that have not been addressed? If yes, please explain.**

**Summary Consideration:** The SDT thanks all stakeholders who offered additional feedback in this section. Some comments revisited issues that had been addressed in other questions, and other comments introduced new minority concerns.

A few commenters suggested, again, the inclusion of definitions or additional standards within the scope of this project, and the SDT appreciates those comments, especially those which included detailed suggestions. While the team is not proposing any definition changes with this round of updated standard changes, they do plan to consider some definition changes or possibly new definitions to prevent future unnecessary registration of GOs and GOPs as TOs and TOPs and ensure that there are no possible reliability gaps. In the next steps of our project, we will consider putting forward definition-related changes for comment separately, following the procedure approved by the Standards Committee after its July 2011 meeting.

The SDT has also considered the inclusion of additional standards and requirements throughout our process and continues to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including additional standards or requirements. The team has elected to propose a slight clarifying change in PRC-004-2, but no changes to the applicability of that or any other standard. They have attempted to make our technical justifications much more robust and comprehensive than they were in the past, as suggested by stakeholders. Please see the accompanying resource documents (posted on the project webpage) for more information.

One commenter expressed concern about whether the SDT's work would be approved by regulators. The drafting team is doing everything we can to work with regulating entities to ensure that forced registrations no longer occur.

For most of the comments, the team made no changes and explained why:

One commenter suggested modifying the definition of Right-of-Way in the currently approved FAC-003-1 (our FAC-003-X). The team could not make any change because the definition proposed in FAC-003-3 has not been formally approved and, in general, modifications to the definition of ROW are outside the scope of our team.

One commenter suggested modifications to the format of the requirements in FAC-003-X, which the SDT determined to be outside its scope.

One commenter expressed concern about a Transmission Owner or Generator Owner having to comply with FAC-003 for a Facility that it did not own. The drafting team does not know why a Transmission Owner or Generator Owner would ever be required to provide evidence, documentation, notification, or inspection of vegetation management for Facilities not owned by that registered entity, except where explicitly agreed upon in a contract. In the absence of additional information to clarify this commenters concern, the SDT does not believe this needs to be addressed within the standard.

One commenter focused on FAC-001 and expressed concern about the “activation” point of the standard and the feasibility of any interconnection. The SDT reminded the commenter that “activation only occurs with an executed Agreement, and that in the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities.

One commenter wondered why only a select set of TO/TOP requirements were being applied to GOs/GOPs. The SDT directed this commenter to the goal of the team, which is to apply select Transmission Owner standards to Generator Owners, not to give them TO status.

Organization	Yes or No	Question 7 Comment
TransAlta Centralia Generation LLC	No	TransAlta Centralia Generation LLC (TransAlta) supports the recommendations put forward by the Project 2010-07 drafting team. The implementation of these recommendations will provide for much needed certainty for owners and operators of generation facilities.
<b>Response:</b> Thank you for your comment.		
SERC Planning Standards Subcommittee	No	The comments expressed herein represent a consensus of the views of the above-named members of the SERC EC Planning Standards Subcommittee only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers.
<b>Response:</b> Thank you for your comment.		
CHPD	No	
BP Wind Energy North	No	



Organization	Yes or No	Question 7 Comment
America Inc.		
Ameren	No	
Independent Electricity System Operator	No	
Tri-State Generation and Transmission, Inc.	No	
Electric Market Policy	No	
Georgia Transmission Corporation	No	
BGE	No	No comment.
Duke Energy	No	
SPP Reliability Standards Development Team	No	
Imperial Irrigation District (IID)	No	
Midwest Reliability Organization's NERC Standards Review Forum (NSRF)	No	
Xcel Energy	No	
Luminant Power	No	

Organization	Yes or No	Question 7 Comment
Wisconsin Electric	No	
ACES Power Members	No	
Arizona Public Service Company	No	
Westar Energy	No	
Bonneville Power Administration	No	
SERC OC Standards Review Group	No	
Notheast Power Coordinating Council	Yes	<p>Regarding the Right-of-Way definitions, the definition in FAC-003-3 is the better of the two. Suggest adding "and maintain" to the first sentence of the definition as follows: The corridor of land under a transmission line(s) needed to operate and maintain the line(s). The width of the corridor is established by engineering or construction standards as documented in either construction documents, pre-2007 vegetation maintenance records, or by the blowout standard in effect when the line was built. The ROW width in no case exceeds the applicable Transmission Owner's or applicable Generator Owner's legal rights but may be less based on the aforementioned criteria. The term Right-of-Way goes beyond Transmission Vegetation Management, and that should be considered in the definition. How does Right-of-Way affect transmission facilities that are routed over bodies of water, or over valleys, highways, etc.? Right-of-Way in relation to underground facilities? The format of FAC-003-X should be made consistent with current NERC guidelines (i.e.--Parts of Requirements should not have R's in their numbering, should be 1.1, 1.2 etc.).</p>
<p><b>Response:</b> Thank you for your comment. It would be outside the scope of this team to modify the definition of Right-of-Way in the currently approved FAC-003-1 (our FAC-003-X), because the definition proposed in FAC-003-3 has not been formally approved and, in general, modifications to the definition of ROW are outside the scope of our team. No change made.</p>		

Organization	Yes or No	Question 7 Comment
		<p>With respect to the changes to the format of the requirements in FAC-003-X, while our drafting team is making changes to update the format of the standard where possible, we do not think it is appropriate to change the listing of the sub-requirements to parts. In earlier versions of standards, the sub-requirements were written as requirements (for instance, they have their own VSLs), and we do not believe it is appropriate within our scope to make that format and labeling change.</p>
<p>Public Service Enterprise Group</p>	<p>Yes</p>	<p>While we generally agree with the drafting team’s modifications to these standards, the team’s approach may not directly resolve the fundamental registration issue regarding a Generation Owner that only owns non-integrated interconnection transmission facilities. The non-integrated interconnection transmission facilities owned by a GO are part of the Bulk Electric System (BES) because they are part of BES generation facilities. The ownership of these non-integrated facilities should not require a GO to also register as a Transmission Owner. The draft team has proposed modifying two FAC standards that would apply to such GO-owned interconnection transmission facilities. These GO-owned interconnection transmission facilities are not, however, “integrated” transmission facilities, as the drafting team correctly points out in its background resource document. A proposed solution to the Generation Owner registration issue is discussed below.</p> <p>NERC’s Rules of Procedure (ROP) require entities to be registered in accordance with the definitions in the NERC Glossary of Terms Used in Reliability Standards (Glossary) and in accordance with the NERC Statement of Compliance Registry Criteria document. The Glossary has these definitions:</p> <ul style="list-style-type: none"> <li>o Generation Owner - Entity that owns and maintains generating units.</li> <li>o Transmission Owner - The entity that owns and maintains transmission facilities.</li> <li>o Facility - A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generator, a shunt compensator, transformer, etc.)</li> <li>o Transmission - An interconnected group of lines and associated equipment for the movement or transfer of electric energy between points of supply and points at which it is transformed for delivery to customers or is delivered to other electric systems.</li> </ul>

Organization	Yes or No	Question 7 Comment
		<p>o Transmission Service - Services provided to the Transmission Customer by the Transmission Service Provider to move energy from a Point of Receipt to a Point of Delivery</p> <p>The drafting team should create a new definition for the term “integrated transmission facilities” and include this new definition in the Glossary. This definition should then be use to modify the definition of Generation Owner so that registration will be clear. While the team chose not to create any new definitions, we believe the registration issue cannot be resolved without modifying the definition of “Generation Owner.”</p> <p>The following definition is proposed for Integrated Transmission Facilities in the NERC Glossary:</p> <p>o Integrated Transmission Facilities (ITF) - ITF are the Facilities that are a subpart of Transmission system that are capable of carrying the flows from multiple generator plants at different points of interconnection for delivery to customers or to other electric systems</p> <p>This proposed ITF definition builds upon FERC precedent in the Open Access Transmission Tariff (OATT) area. FERC has recognized that facilities that can carry flows from multiple supply points and deliver that power to either customers or other electric systems are proper facilities to include in an OATT and define the “Transmission System” for OATT purposes. The term “Transmission System” is an OATT-defined term that means “The facilities owned, controlled or operated by the Transmission Provider that are used to provide transmission service under Part II [Point-to-Point Transmission Service] and Part III [Network Integrated Transmission Service] of the Tariff.” Under FERC’s precedent, facilities such as generator step-up transformers and generator interconnecting transmission facilities have been excluded from the OATT; i.e., they are not facilities that provide Transmission Service because they cannot carry the flows from multiple supply points for delivery to customers or other electric system - their only use is to the Generation Owner. They perform two functions for a GO:</p> <ol style="list-style-type: none"> <li>1. They deliver power from the GO’s generators at a site to the OATT-defined Transmission System, and</li> <li>2. They deliver off-site power from the OATT-defined Transmission System to the generators at a site when the generators at a site are not operating.</li> </ol>

Organization	Yes or No	Question 7 Comment
		<p>While building on FERC OATT precedent, the proposed definition of “Integrated Transmission Facilities” does not require an applicable Transmission Service tariff to identify those facilities. Integrated Transmission Facilities are simply defined as those that capable of carrying flows from multiple supply points for delivery to customers or to other electric systems. Using the ITF definition, the definition of Generation Owner could be modified as follows:</p> <ul style="list-style-type: none"> <li>o Generation Owner - Entity that owns and maintains generating units but which does not own or maintain Integrated Transmission Facilities.</li> </ul>
<p><b>Response:</b> Thank you for your comment. We appreciate the detailed suggestions. While we are not proposing any definition changes with this round of updated standard changes, we do plan to consider some definition changes or possibly new definitions to prevent future registration and ensure that there are no possible gaps. In the next steps of our project, we will consider putting forward definition-related changes for comment separately, as is now allowed by the Standards Committee after its July 2011 meeting.</p>		
EPSA	Yes	<p>EPSA can appreciate the SDT’s decision that it not propose new defined terms for the NERC Glossary. The SDT bases the decision on outreach meetings with NERC, regional compliance managers and industry organizations. EPSA supports outreach but still believes that the SDT should propose definitions for the NERC Glossary. The definitions can serve as a basis for the outreach meetings while also further limiting reliability gaps - real or perceived. Much as EPSA expressed in its White Paper comments there is still a need for a definition for generator interconnection facilities. In addition, because integrated transmission facility has also played a big part in the cases that have prompted the need for Project 2010-07 the drafting team should propose a glossary change for that definition as well. A definition for generation interconnection facilities is necessary in Project 2010-07 Standard so that the interface between generators and transmission system can be clearly established and any ambiguities about reliability responsibilities for GOs &amp; GOPs and TO &amp; TOPs can be eliminated.</p> <p>EPSA recommended the definitions from the Ad-Hoc Group Report could be used for incorporating the Generator Interconnection Facility into the standard:</p> <ul style="list-style-type: none"> <li>Generator Interconnection Facility - Sole-use facility for the purpose of connecting the generating unit(s) to the transmission grid. In this regard, the sole-use facility</li> </ul>

Organization	Yes or No	Question 7 Comment
		<p>only transmits power associated with the interconnecting generator, whether delivered to the grid or delivered to the generator for station service or auxiliary load, or delivered to meet cogeneration load requirements.</p> <p>Generator Interconnection Operational Interface - Location at which operating responsibility for the Generator Interconnection Facility changes between the Transmission Operator and the Generator Operator.</p> <p>These definitions were developed with due consideration for varying configurations, outages, and generators materiality to the BES. The Facility definition defines the purpose of the facility, while the Generator Interconnection Operational Interface definition provides the functional lines of demarcation between the GO and the TO. The definitions were developed based on the purpose of generator interconnection facilities, their usage and how their usage differs from transmission facilities that comprise the interconnected grid. Similar to EPSC's assertions on the White Paper competitive suppliers believe this is a sound basis for distinguishing BES facilities. EPSC also suggests that the SDT include the following proposed definition for Integrated Transmission Facilities for inclusion in the NERC Glossary:</p> <p style="padding-left: 40px;">Integrated Transmission Facilities (ITF) - ITF are the Facilities that are a subpart of Transmission system that are capable of carrying the flows from multiple generator plants at different points of interconnection for delivery to customers, or to other electric systems.</p> <p>This proposed ITF definition builds upon Commission precedent in the Open Access Transmission Tariff (OATT) area. FERC has recognized that facilities that can carry flows from multiple supply points and deliver that power to either customers or other electric systems are proper facilities to include in an OATT and define the "Transmission System" for OATT purposes. The term "Transmission System" is an OATT-defined term that means "The facilities owned, controlled or operated by the Transmission Provider that are used to provide transmission service under Part II [Point-to-Point Transmission Service] and Part III [Network Integrated Transmission Service] of the Tariff." Under Commission precedent, facilities such as generator step-up transformers and generator interconnecting transmission facilities have been excluded from the OATT; i.e., they are not facilities that provide Transmission Service because they cannot carry the flows from multiple supply points for delivery to customers or other electric system - their</p>

Organization	Yes or No	Question 7 Comment
		<p>only use is to the GO and perform two functions:</p> <ol style="list-style-type: none"> <li>1. They deliver power from the GO's generators at a site to the OATT-defined Transmission System, and</li> <li>2. They deliver off-site power from the OATT-defined Transmission System to the generators at a site when the generators at a site are not operating.</li> </ol> <p>While building on FERC OATT precedent, the proposed definition of "Integrated Transmission Facilities" does not require an applicable Transmission Service tariff to identify those facilities. Integrated Transmission Facilities are simply defined as those that capable of carrying flows from multiple supply points for delivery to customers or to other electric systems. Using the ITF definition, the definition of Generation Owner could be modified as follows:</p> <p style="padding-left: 40px;">Generation Owner - The Entity that owns and maintains generating units but which does not own or maintain Integrated Transmission Facilities.</p> <p>EPSA encourages the Project 2010-07 SDT to consider fitting the above definitions into the current proposal for inclusion in the NERC Glossary. Therefore, EPSA respectfully requests that the SDT for Project 2010-07 consider the all the recommendations made herein to the seven questions.</p>
<p><b>Response:</b> Thank you for your comment. We appreciate the detailed suggestions. While we are not proposing any definition changes with this round of updated standard changes, we do plan to propose some definition changes or possibly new definitions to prevent registration and ensure that there are no possible gaps. In the next steps of our project, we will consider putting forward definition-related changes for comment separately, as is now allowed by the Standards Committee after its July 2011 meeting</p>		
PacifiCorp	Yes	<p>PacifiCorp believes the Standards Drafting Team should clarify the Transmission Owner and/or the Generator Owner are not required to provide evidence, documentation, notification, or inspection of vegetation management for facilities not owned by the Transmission Owner and/or the Generator Owner.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team does not know why a Transmission Owner or Generator Owner would ever be required to provide evidence, documentation, notification, or inspection of vegetation management for Facilities not owned by that registered entity, except where explicitly agreed upon in a contract. We do not believe this needs to be addressed within the</p>		

Organization	Yes or No	Question 7 Comment
standard. No change made.		
Southern Company	Yes	<p>(1) The SDT needs to review the June 16, 2011 FERC Order on Cedar Creek and Milford and factor this into the equation. The FERC Order concludes that the Cedar Creek and Milford entities must register as a TO and TOP. In addition to FAC-003, the Cedar Creek and Milford order lists the following standards and requirements that apply to these entities as a TO/TOP:</p> <ul style="list-style-type: none"> <li>o PER-003-1, R1, R1.1, R1.2 (requiring NERC-certified transmission operators);</li> <li>o PRC-001-1, R2, R2.2, R4, R6 (notification of relay or equipment failures);</li> <li>o PRC-004-1, R1 (analyzing protection system misoperations);</li> <li>o FAC-014-2, R2 (establishment of system operating limits);</li> <li>o TOP-001, R1 (authority to take actions to alleviate operating emergencies);</li> <li>o TOP-004-2, R6, R6.1, R6.2, R6.3, R6.4 (establishment of formal policies to address voltage levels, planned outages, switching, Interconnection Reliability Operating Limits, and System Operating Limits).</li> </ul> <p>The SDT needs to address these specific requirements in sufficient detail by either revising the Project 2010-07 Background Resource Document or proposing revisions to these standards to address any reliability gaps. For example, we recommend, as a minimum, that the Background Resource Document discussion under PRC-001-1 be revised to state (underlined text added), “Generator Operators and the scope of protection equipment for generation interconnection Facilities are already appropriately accounted for in this standard in requirements R1, R2, R3, and R5.” Please note that this statement, even with our proposed revision, conflicts with the FERC Order on Cedar Creek and Milford, Paragraphs 64, 65, and 78 where FERC states that Cedar Creek and Milford must register as a TO and TOP to ensure the protection system coordination requirements in R2 and R4 of PRC-001 are met. Thus, the discussion for PRC-001-1 in the Project 2010-07 Background Resource Document needs additional language to demonstrate adequacy of the GO requirements in order to prevent GOs that own generation interconnection Facilities from having to register as a TO and TOP.</p> <p>(2) In addition, we believe the SDT should add supporting discussion to the</p>



Organization	Yes or No	Question 7 Comment
		<p>Background Resource Document to explain why the following standards adequately cover GO/GOP requirements at the Transmission Interface: PRC-004-2, PRC-005-1, PRC-023-1. For example, the Background Resource Document could state that PRC-023-1 Section A.4 Applicability already includes, "4.2. Generator Owners with load-responsive phase protection systems as described in Attachment A, applied to facilities defined in 4.1.1 through 4.1.4."</p> <p>(3) Furthermore, FERC's analysis in the Cedar Creek and Milford order suggests that reliability gaps will occur if certain entities are not registered as TO/TOP. The GRTI SAR DT should assess why its findings are different from the Commission's findings. By way of background, the GRTI SAR DT provides that its own assessment of the GOTO Ad Hoc Group Final Report concludes with a belief that there are only two standards requiring modifications to address reliability gaps - FAC-001 and FAC-003 (Background Resource Document, page 3). FERC will most likely require that NERC clearly demonstrate and provide technical support for the position that GO's only need to comply with FAC-001 and FAC-003 and not the other standards noted by FERC. The Background Resource Document does not appear to provide adequate technical support for the GRTI SAR DT position. Therefore, the GRTI SAR DT should develop that technical support in preparation for the filing of these revised standards at FERC.</p>
<p><b>Response:</b> Thank you for your comment. We have considered the inclusion of additional standards and requirements throughout our process and we continue to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including additional standards or requirements. We have elected to propose a slight clarifying change in PRC-004-2, but no changes to the applicability of that or any other standard. We have attempted to make our technical justifications much more robust and comprehensive than they were in the past, as you suggest. Please see the accompanying resource documents for more information.</p>		
APS	Yes	Leave GOs out of the standards, because it just adds more regulation and reporting requirements not needed.
<p><b>Response:</b> Thank you for your comment. The drafting team and the majority of stakeholder commenters support making both FAC-001 and FAC-003 applicable to Generator Owners to ensure that all Generator Owner responsibilities at the generator interconnection Facility are covered under NERC Reliability Standards. No change made.</p>		

Organization	Yes or No	Question 7 Comment
Sempra Generation	Yes	When implemented, the recommendations of the Project 2010-07 Team go a long way toward providing the regulatory and compliance certainty needed by generators who own or operate Generator Interconnection Facilities. NERC is encouraged to provide these industry-supported amendments to the NERC Board of Trustees in the near future. Sempra Generation also supports the comments, being concurrently filed, of the Electric Power Supply Association (EPSA).
<b>Response:</b> Thank you for your comment.		
Exelon	Yes	FAC-001-1. Exelon has generating stations that have the Main Power Transformer (MPT) disconnect as the point of demarcation. The station owns the short leads from the MPT disconnect back to the generator and the applicable TO owns from the MPT disconnect up to and including the switchyard. It is not practical for another entity to request to interconnect to the MPT disconnect nor should it be allowed. The SDT should consider verbiage to the standard that does not allow requests to interconnect to a MPT disconnect. 2. Exelon is having difficulty determining how this standard would apply to GOs and how GOs would implement the standard; suggest that examples be provided in an implementation document specifically showing where and how this standard would apply.
<p><b>Response:</b> Thank you for your comment.</p> <p>(1) FAC-001-1 would not be “activated” simply with another entity’s request to interconnect. The standard is “activated” only with an executed Agreement to evaluate the reliability impact of interconnection. If another entity cannot interconnect to the MPT, the process should not get to the point of an executed Agreement and thus this standard would never apply.</p> <p>(2) In the past (for instance, 134 FERC ¶ 61,109 at P. 19 and 134 FERC ¶ 61,064 at P. 13), Generator Owners have received or have been directed to execute interconnection requests for their Facilities, and the drafting team thinks it is important to clarify the responsibilities related to such a request in NERC’s Reliability Standards by including applicable Generator Owners in FAC-001-1. We have documented our technical justification in an accompanying resource document and encourage you to review it.</p>		
Ingleside Cogeneration LP	Yes	There is a fundamental issue related to the interconnection of generation and distribution facilities into the transmission grid. There is a myriad of complex architectures which make the designation of ownership and operational responsibilities

Organization	Yes or No	Question 7 Comment
		<p>unclear in both cases. Both this team’s efforts and those by the project team redefining the extent of the BES have run into this issue.</p> <p>Ingleside Cogeneration LP recognizes that the effort to properly assign reliability responsibilities in these gray-area connections is difficult. However, pushing the issue back to the GO/GOP by looking for them to jointly determine responsibilities with adjacent entities will create every conceivable arrangement possible.</p> <p>It seems like it should be possible to address a handful of common interconnection configurations at the start. As knowledge builds, perhaps other architectures could be added. This seems to be the direction that the project team redefining the extent of the BES is heading.</p> <p>Lastly, we need some assurance that regulators will work with us as we go down this path. Right now, the feeling is that they will continue to use forced registrations as a hammer - which may render moot this team’s efforts anyways.</p>
<p><b>Response:</b> Thank you for your comment.</p> <p>The drafting team is doing its best to coordinate with regulators to ensure that forced registrations no longer occur. While we can never be sure exactly what decision the regulators will make, our intent is to make changes through this project that prevent any future forced registrations. We have encouraged regulators to provide formal comments if they believe our changes are not going to close the gap. While there can be similarities, the SDT believes that each interconnection agreement is different. The SDT believes that each party to such agreement should have identified its ownership and operational responsibilities. If there is uncertainty as to ownership of operational responsibility of a Facility used to interconnect a generator, the respective GO/GOPs and TO/TOPs should be addressing these. Resolving these uncertainties can only occur between the affected parties.</p>		
Manitoba Hydro	Yes	<p>The direction of the background resource document gives special treatment to the Generator Owner in that it allows the Generator Owner TO status for a couple of standards (FAC-001 and FAC-003), but exempts the Generator Owner from many of the standards applicable to a TO. A Generator Owner that owns BES transmission should be held accountable for the specific Requirements and Reliability Standards applicable to the TO and Transmission Operator functions. If no other entity assumes accountability for these specific Requirements and Reliability Standards on the</p>

Organization	Yes or No	Question 7 Comment
		<p>Generator Owner BES transmission (for example system operation, protection and communication), there will be a reliability gap. Improper operation, coordination and protection of the Generator Owner BES transmission could have an impact on reliability.</p>
<p><b>Response:</b> Thank you for your comment. The purpose of the drafting team is “To propose a set of changes to existing requirements and definitions, as well as additional requirements and definitions, that collectively adds significant clarity to Generator Owners and Generator Operators regarding their reliability standard obligations at the interface with the interconnected grid. This global strategy is proposed to expedite the closing of the reliability gap.” The SDT is applying select Transmission Owner standards to Generator Owners, not attempting to give them TO status. The SDT believes that each interconnection agreement is different. The SDT believes that each party to such agreement should have identified its ownership and operational responsibilities. If there is uncertainty as to ownership of operational responsibility of a Facility used to interconnect a generator, the respective GO/GOPs and TO/TOPs should be addressing these. Resolving these uncertainties can only occur between the affected parties.</p>		
<p>Constellation Power Generation</p>	<p>Yes</p>	<p>Constellation appreciates and supports the work of the standard drafting team. We recognize the significant time invested by technical experts from industry to consider the appropriate application of reliability standards to address concerns raised about coverage of transmission at the generator interface. The recent FERC Order concerning Cedar Creek and Milford wind suggested that the list of applicable standards needing revision should go beyond FAC-001 and FAC-003.</p> <p>We appreciate the discussion and concerns raised by FERC in the order; however, the discussion is limited by failing to consider these issues in light of the full package of existing standards. Below is a look at the FERC suggested standards and how they intersect with other standards:</p> <ul style="list-style-type: none"> <li>o PRC-001-1, Requirements R2, R2.2, R4; FERC expressed concern that certain protection system components may not be well coordinated with the RC. However, the same standard (PRC-1) addresses this issue by requiring all GOs to ensure coordination of their protection system with interconnected parties. Further, FAC-002 requires that all new facilities undergo reviews by the TOP, BA, etc.</li> <li>o PRC-004-1 Requirement R1; FERC expressed concern that certain protection system components may not be analyzed for misoperations. However, the same standard (PRC-4) addresses this issue by requiring all GOs to ensure that they</li> </ul>

Organization	Yes or No	Question 7 Comment
		<p>analyze all misoperations on their protection system which would include the protection of the tie line.</p> <ul style="list-style-type: none"> <li>o TOP-004-2, Requirements R6, R6.1, R6.2, R6.3, R6.4; FERC expressed concern that coordination may be lacking between a GO and a TO with regards to the generator tie line. However, TOP standards applicable to GOs address this issue by requiring all GOs to coordinate all maintenance and emergency outages (both forced and planned) with all applicable interconnected parties. Further, all ISO procedures require the same of GOs.</li> <li>o PER-003-1, Requirements R1, R1.1, R1.2; FERC expressed concern that certain generator operators are responsible for the real time operation of the interconnected BES without being NERC certified operators, potentially causing a reliability gap. Generator Operators do not monitor and control the BES, they control and monitor generators that it operates and relays information to other operating entities. Therefore, NERC certification is not required.</li> <li>o FAC-003-1, Requirements R1, R2; FERC and the drafting team seem aligned in the need to revise this standard and the revision proposal includes such a revision.</li> <li>o TOP-001, Requirement R1; FERC expressed concern that certain tie lines may not be required to operate in such a way as to alleviate operational emergencies. However, IRO and TOP standards applicable to GOs address this issue by requiring all GOs to operate as directed by their TOP, BA, or RC as directed and must render emergency assistance.</li> <li>o FAC-014-2, Requirement R2; FERC expressed concern that certain tie lines may have a rating based on a methodology that may not be consistent with the methodology used by the RC. However, standards FAC-8 and FAC-9 address this issue by requiring all GOs to develop a methodology to rate all equipment, and that the RC has the authority to challenge the GO on that methodology. The onus is on the GO to either change their methodology and rating accordingly, or provide a technical justification as to why they cannot adopt the changes. Further, a generator will never be limited by its tie line, as a generator's profits are directly tied to its output. Therefore no generator would limit its facility to the</li> </ul>

Organization	Yes or No	Question 7 Comment
		equipment that is delivering that output.
<p><b>Response:</b> Thank you for your comment. The drafting team has considered the inclusion of the requirements listed in the Cedar Creek and Milford orders in the past, and we have been revisiting them throughout our process. We continue to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including additional standards or requirements. We appreciate the rationale you have included within your comment, and where we agree, we have incorporated it into our own.</p> <p>We have elected to propose a slight clarifying change in PRC-004-2, but no changes to the applicability of that or any other standard. Please see the accompanying resource documents for more information.</p>		
Utility Services, Inc.	Yes	<p>In one of the supporting documents for the upcoming comments, the GO/TO group included the following statement in support for the rationale on FAC-001. In its first posting for informal comment, the drafting team set the “trigger” for the application of FAC-001 as the receipt of a request for interconnection. Many commenters disagreed with this approach and suggested that the “trigger” be based upon “the intent or obligation” to interconnect a new Facility to an existing interconnecting Facility that is owned by a generator. Accordingly, the drafting team has proposed language to address this concern. The intent of this modified language is to start the compliance clock at such time as the Generator Owner executes an Agreement to perform the reliability assessment required in FAC-002-1. This step should occur whether the generator voluntarily agrees to the interconnection request or is compelled by a regulatory body to do so. In either case, we expect the Generator Owner and the requestor to execute some form of Agreement. We intentionally excluded a specific reference to the form of Agreement (such as a feasibility study) in deference to comments that we should avoid comingling of commercial and reliability aspects in reliability standards.</p> <p>I wonder about whether or not this can work timing-wise. It says the compliance clock starts with the agreement to perform the reliability assessment for FAC-002. The FAC-001 requirements outline the need for a registered entity to document, maintain, and publish facility connections requirements in order to be compliant. If the clock starts at the agreement for the assessment, does that mean that you then document, maintain, and publish the connection requirements? Don’t the connection requirements usually</p>

Organization	Yes or No	Question 7 Comment
		<p>outline the terms for the “agreement for the assessment”? I am not sure that I understand the timing sequence in order to be compliant to the standard. I would think that the agreement needs to be in place at the time of the effective date of the standard, not upon an application.</p>
<p><b>Response:</b> Thank you for your comment. We have provided a detailed explanation of how this process might look in the accompanying FAC-001-1 technical justification. Please refer to that for more information.</p>		
<p>FirstEnergy Corp</p>	<p>Yes</p>	<p>The June 16, 2011 FERC Order denying the appeals of two wind generating facilities- Cedar Creek and Milford - of the NERC determinations that Cedar Creek and Milford must each be registered as a transmission owner and transmission operator on the NERC Compliance Registry complicates the GO-TO drafting team’s work. However, the issues may be distinct and different in the end. The existing GO-TO team’s work product defines new reliability expectations for a generator owner regardless of whether or not the same entity is also being required to have a TO-TOP “light” compliance registration. In the Order, FERC describes what it believes are an appropriate limited set of TO-TOP requirements when a TO-TOP “light” registrations is deemed warranted for a traditional generation owner. The drafting team should describe what, if any, impact the FERC June 16 Order is having on its work scope.</p> <p>One minor comment for the background resource document. On page one, the last sentence of the 1st paragraph which currently reads “ ... appropriate level of reliability for the BES.” Consider changing to read “ ... Adequate Level of Reliability for the BES.” And, include a footnote directing the reader to NERC’s definition/paper describing ALR. The later references to “adequate level of reliability” within the document (i.e. page 2, 2nd paragraph could then be reduced to the acronym ALR.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team has considered the inclusion of the requirements listed in the Cedar Creek and Milford orders in the past, and we have been revisiting them throughout our process. We continue to conclude, with stakeholder support, that no additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including additional standards or requirements.</p> <p>Thank you for pointing out the opportunity to use the term “Adequate Level of Reliability.” Because NERC has appointed a task force to explore whether that definition of Adequate Level of Reliability needs to be changed, we are avoiding references to it in our latest</p>		



Organization	Yes or No	Question 7 Comment
resource document.		
PPL Supply Group	Yes	
American Wind Energy Association		<p>The American Wind Energy Association (AWEA) appreciates the opportunity to submit these formal comments on the NERC Project 2010-07. AWEA supports the general direction indicated by both the Generator Requirements at the Transmission Interface Ad Hoc Group (GOTO Ad Hoc Group), and the Project 2010-07 Standards Development Team (SDT). We agree with the sentiments from both groups that a Generator Owner (GO) or Generator Operator (GOP) that also owns or operates a generator interconnection facility (GIF), should not be required to register as a Transmission Owner (TO) and/or Transmission Operator (TOP) strictly because they own or operate the GIF. We also agree that requiring these GOs or GOPs to comply with all the TO/TOP standards would have little effect on or benefits to reliability of the Bulk Electric System.</p> <p>AWEA supports the aim of these groups to address any reliability gap that may exist with regard to GIFs by considering such facilities as part of the generating facility, and therefore also subject to the GO/GOP standards. AWEA also supports the approach of identifying a limited number of TO/TOP standards, such as FAC-001 and FAC-003, which should also apply to GIFs. We would be concerned, however, if additional requirements were added beyond these two, without serious consideration by the SDT and additional industry experts. The recent FERC order on the required registration as TOs and TOPs of two generator interconnection facilities may raise some question about the direction that the GO/TO and the SDT have taken so far on this topic. AWEA urges NERC and the SDT to use caution in considering any additional standards to apply to GIFs as the current approach of the GO/TO and SDT efforts have been generally supported. Consideration of any addition standards with respect to GIFs should be done on a standard-by-standard basis, reviewing the applicability of each standard as well as the impact on the reliability of the Bulk Electric System.</p>
<p><b>Response:</b> Thank you for your comment. The drafting team has considered the inclusion of additional standards and requirements in the past, and we have been revisiting them throughout our process. We continue to conclude, with stakeholder support, that no</p>		



Organization	Yes or No	Question 7 Comment
<p>additional substantive standard or requirement changes are necessary to achieve the goal of this project. With this posting, the drafting team has revisited those standards yet again and developed a comprehensive document and spreadsheet tracing our rationale (at every stage of the process) for not including additional standards or requirements.</p>		
<p>Cogeneration Association of California</p>		<p>The resolution of this issue regarding generator interconnection facilities should compel a certain result in determining how to classify and register generator tie-lines. Under the current standards, NERC is compelled to register owners with generator tie-lines as transmission owners. FERC has affirmed this. The changes to the standards should be such that NERC and FERC are compelled to consider the tie-lines as part of the generator facilities. The current proposal from this task force does not achieve that result. While the proposal does make very appropriate changes to certain reliability standards, it does not change the basic definition of the Bulk Electric System or change NERC's <i>Statement of Compliance Registry Criteria</i>, to determine how tie-lines are classified. Even though the relevant reliability standards would be changed so that they are also applicable to generator facilities, NERC and the regional entities will continue to apply the same definition and criteria and can continue to classify the tie-lines as Transmission.</p> <p>The solution is to change the BES definition and NERC <i>Statement</i> as well as changing the applicability of the relevant reliability standards. The background resource document from this group suggests that a change in the BES definition was part of the overall solution, but the Project 2010-17 team did not address this in its proposed definition. The concept paper from the 2010-17 group does include "generator interconnection line leads," but the formal definition paper does not.</p> <p>This project group should include in its formal proposal a change to the definition of BES, including generator interconnection facilities within the definition of generation.</p>
<p><b>Response:</b> Thank you for your comment. While we are not proposing any definition changes with this round of updated standard changes, we do plan to propose some definition changes or possibly new definitions to prevent registration and ensure that there are no possible gaps. In the next steps of our project, we will consider putting forward definition-related changes for comment separately, as is now allowed by the Standards Committee after its July 2011 meeting. Although this drafting team cannot itself make changes to the Statement of Compliance Registry Criteria, our hope is that modifications to definitions would provide the language and the impetus to make those Registry Criteria changes.</p>		

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<p>While the Project 2010-07 SDT coordinated with the Project 2010-17 BES SDT very early on, the Project 2010-17 SDT elected not to include any reference to generator interconnection Facilities within the definition of generation. We will consider making further suggestions during future comment periods, and you should do the same.</p>		
American Electric Power		
Tacoma Power		
Indeck Energy Services		
LG&E and KU Energy		
American Transmission Company		

END OF REPORT