

# NERC

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Meeting Agenda GOTO Team

**Monday, April 27, 2009 | 3–5 p.m. EST**

**Dial-in Number:** 1-281-540-4943

**Conference Code:** 940288

**WebEx Information:**

Topic: GOTO Team WebEx

Password: standards

<https://nerc.webex.com/nerc>

1. **NERC Antitrust Guidelines**
2. **Approve April 14, 2009 Meeting Minutes**
3. **Review of Transmission Operator Requirements not currently applicable to Generator Operators**
4. **Objectives for May 21–22, 2009 Meeting**
  - a. Solidify criteria to identify what standards apply to generators
  - b. Apply criteria on existing standards to determine appropriateness of criteria
  - c. How to best document formally (e.g. NERC Glossary, Changes to Standards)
5. **Future Conference Calls and Meeting Dates**
6. **Adjourn**

**Next Meeting — In-Person**

**May 21, 2009 — 1–5 p.m.**

**May 22, 2009 — 8–11 a.m.**

Marriott Atlanta Airport

4711 Best Road

Atlanta, GA 30337

(404) 766-7900

## Attachment 1

### Problem Statement Adopted March 31, 2009

#### Problem Statement:

Certain equipment owned and/or operated by generators may be defined as part of the Bulk Electric System. As such, the team needs to determine which owner and operating requirements are needed for reliability purposes for these facilities and then identify the functional entity<sup>1</sup> accountable for compliance to those requirements.

#### Assumptions:

1. There are pieces of equipment at 100 kV and above currently owned and operated by generators that may fall under the definition of Bulk Electric System and therefore are under the purview of the NERC Reliability Standards.
2. For pieces of equipment identified in assumption No. 1 above, at least one functional entity must be identified to be responsible for each standard requirement applicable to these facilities at an ownership and operating level, understanding that multiple ownership and operating arrangements exist.<sup>2</sup>
3. Separate the ownership expectations from the operating expectations in the discussion.
4. Current standard requirements assigned to Generator Owners and Generator Operators are appropriate.

#### Process to Address Identified Problem

1. Review the list of standard requirements applicable to Transmission Owners and/or Transmission Operators that are not currently applicable to Generator Owners and/or Generator Operators.
2. Determine which of the Transmission Owner standard requirements not assigned to Generator Owners should always be, never be, or could possibly be assigned to address potential reliability gaps based on the equipment owned by the Generator Owner.
3. Determine which of the Transmission Operator standard requirements not assigned to Generator Operators should always be, never be, or could possibly be assigned to address potential reliability gaps based on the equipment operated by the Generator Operator.
4. Determine if these requirements are already covered by other existing reliability standard requirements.
5. If not, determine a strategy for identifying the functional entity that should be assigned the responsibility for these requirements, not necessarily limited to the current list of functional entities.
6. Perform sensitivity analyses using the list of “parking lot” questions/issues to determine further activities for the team.
7. Finalize recommendations within a final report that includes potential SARs.

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<sup>1</sup> The use of the term “functional entity” is not intended to limit team consideration to those functional entities currently utilized in NERC’s Reliability Standards. If in its deliberation, the team identifies a new functional entity that should be defined, the team can make such a proposal.

<sup>2</sup> The goal is to assign responsibility for these requirements to a single functional entity but recognize that clear delineation of these responsibilities must be identified when multiple entity arrangements apply.

## **NERC Antitrust Compliance Guidelines**

### **I. GENERAL**

It is NERC's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.

It is the responsibility of every NERC participant and employee who may in any way affect NERC's compliance with the antitrust laws to carry out this commitment.

Antitrust laws are complex and subject to court interpretation that can vary over time and from one court to another. The purpose of these guidelines is to alert NERC participants and employees to potential antitrust problems and to set forth policies to be followed with respect to activities that may involve antitrust considerations. In some instances, the NERC policy contained in these guidelines is stricter than the applicable antitrust laws. Any NERC participant or employee who is uncertain about the legal ramifications of a particular course of conduct or who has doubts or concerns about whether NERC's antitrust compliance policy is implicated in any situation should consult NERC's General Counsel immediately.

### **II. PROHIBITED ACTIVITIES**

Participants in NERC activities (including those of its committees and subgroups) should refrain from the following when acting in their capacity as participants in NERC activities (e.g., at NERC meetings, conference calls and in informal discussions):

- Discussions involving pricing information, especially margin (profit) and internal cost information and participants' expectations as to their future prices or internal costs.
- Discussions of a participant's marketing strategies.
- Discussions regarding how customers and geographical areas are to be divided among competitors.
- Discussions concerning the exclusion of competitors from markets.
- Discussions concerning boycotting or group refusals to deal with competitors, vendors or suppliers.

### **III. ACTIVITIES THAT ARE PERMITTED**

From time to time decisions or actions of NERC (including those of its committees and subgroups) may have a negative impact on particular entities and thus in that sense adversely impact competition. Decisions and actions by NERC (including its committees and subgroups) should only be undertaken for the purpose of promoting and maintaining the reliability and

adequacy of the bulk power system. If you do not have a legitimate purpose consistent with this objective for discussing a matter, please refrain from discussing the matter during NERC meetings and in other NERC-related communications.

You should also ensure that NERC procedures, including those set forth in NERC's Certificate of Incorporation and Bylaws are followed in conducting NERC business. Other NERC procedures that may be applicable to a particular NERC activity include the following:

- Reliability Standards Process Manual
- Organization and Procedures Manual for the NERC Standing Committees
- System Operator Certification Program

In addition, all discussions in NERC meetings and other NERC-related communications should be within the scope of the mandate for or assignment to the particular NERC committee or subgroup, as well as within the scope of the published agenda for the meeting.

No decisions should be made nor any actions taken in NERC activities for the purpose of giving an industry participant or group of participants a competitive advantage over other participants. In particular, decisions with respect to setting, revising, or assessing compliance with NERC reliability standards should not be influenced by anti-competitive motivations.

Subject to the foregoing restrictions, participants in NERC activities may discuss:

- Reliability matters relating to the bulk power system, including operation and planning matters such as establishing or revising reliability standards, special operating procedures, operating transfer capabilities, and plans for new facilities.
- Matters relating to the impact of reliability standards for the bulk power system on electricity markets, and the impact of electricity market operations on the reliability of the bulk power system.
- Proposed filings or other communications with state or federal regulatory authorities or other governmental entities.
- Matters relating to the internal governance, management and operation of NERC, such as nominations for vacant committee positions, budgeting and assessments, and employment matters; and procedural matters such as planning and scheduling meetings.

Any other matters that do not clearly fall within these guidelines should be reviewed with NERC's General Counsel before being discussed.

Approved by Board of Trustees: June 14, 2002 — Technical revisions: May 13, 2005

## DRAFT Conference Call Minutes — Meeting 3 GO TO Team

April 14, 2009

### Attendees:

Scott Helyer — Tenaska, Chair  
Steve Cobb — Salt River Project  
Keith Daniel — Georgia Transmission Corporation  
Tony Jankowski — We Energies  
Greg Mason — Dynegy  
Eric Mortenson — Exelon  
Tim Ponseti — Tennessee Valley Authority  
Kent Saathoff — Electric Reliability Council of Texas  
Gerry Adamski — NERC

### Introductions

Mr. Helyer convened the call at 3:05 p.m.

### NERC Antitrust Guidelines

Mr. Adamski referred the group to NERC's antitrust guidelines contained in the agenda package and summarized the key aspects for the group.

### Minutes — March 31, 2009 Conference Call

The team approved the draft minutes were approved without modification.

### Discussion of Transmission Owner Requirements

Mr. Helyer initiated the discussion by reviewing the ground rules for analyzing the transmission owner or transmission operator requirements that currently do not apply to generator owners or generator operators, respectively. Based on the survey conducted among team members, if there was general consensus on a particular requirement with respect to their application, the team would not extensively discuss at this point but would focus attention on those requirements with disparate opinions. The four options for each requirement were identified as:

- Should always apply to generator owners or generator operators as written
- Should never apply to generator owners or generator operators as written
- Should possibly apply to generator owners or generator operators as written depending upon conditions, configurations, or other circumstances

- Need to be re-written to apply

The results of the team survey indicated that general consensus existed for each standard in the Transmission Owner except FAC-001, FAC-003, and PRC-004. The team spent the substantive portion of the meeting discussing these standards, while keeping open the possibility of revisiting the other requirements that achieved team consensus if necessary. In this ensuing discussion, the team raised several significant issues and questions that merit investigation before deciding if the requirements in these three standards should apply to generators at the transmission interface. These are discussed below:

### **FAC-001 — Facility Connection Requirements**

When does a generator owner/operator become a transmission owner/operator by virtue of its interconnection facilities

- At the receipt of a request for interconnection service?
- When service is granted?
- When a facilities study is done as part of the interconnection process?

Where does the exception for radial load occur?

- NERC Rules of Procedure?
- Definition of Bulk Electric System (NERC Glossary)

### **FAC-003 — Transmission Vegetation Management**

- Does FAC-003 apply to load supplied by radial transmission?
- Consider the costs to develop a vegetation management plan?
- Do relays need to operate for FAC-003 to be relevant? If so, how is this then a FAC-003 issue?
- Need to eliminate risk of contact, which is why FAC-003 must apply.

### **PRC-004 — Analysis and Mitigation of Transmission and Generation Protection System Misoperations**

- Need to define what is a generating facility versus a transmission facility?
- Who is the owner/operator of the radial generation interconnection facilities?
- Requirement R2 is the same R1. Do we need to consider R1 if R2 covers it.

### **General**

- Need to identify any requirements included in the survey that are already applicable to the generator owner or operator through other requirements not included in the survey.
- Do we need definition or new functional category of interconnection facility owner and/or operator?

- How do we relate the significance of the facility to the reliability of the bulk electric system

In the end, the team agreed it would be of benefit to review the Transmission Operator requirements and address the substantive questions that remain after the list of key issues was identified through the requirement review. These issues would be best discussed at the in-person meeting in May.

### **Conference Call and Meeting Schedule**

The team agreed to move the conference call from Tuesday, April 28<sup>th</sup> to Monday, April 27<sup>th</sup> at 3–5 p.m. Additionally, the team agreed to an in-person meeting in Atlanta (near the airport) on the afternoon of Thursday, May 21<sup>st</sup> and the morning of Friday, May 22, 2009.

Monday, April 28, 2009 — 3–5 p.m. EDT (Conference Call and WebEx)

Thursday, May 21, 2009 — 1–5 p.m. — Friday, May 22, 2009 — 8–11 a.m. at the Marriott Atlanta Airport

### **Adjourn**

The meeting was adjourned at 5:15 p.m.

## Attachment 1

### Action Items

1. Obtain the criteria used by TRE and WECC to register certain generator owners and operators as transmission owners and operators. (Adamski — 3/17/09)

### Issues “Parking Lot”

1. Are the functional definitions and criteria clear in the NERC Glossary and NERC Compliance Registry relative to transmission and generation entities?
2. Should we separate the consideration of transmission owner and transmission operator requirements in this discussion?
3. Entity vs. asset registration?
4. Are the interconnection facilities part of the generating facility by definition?

### FAC-001 — Facility Connection Requirements

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- Need to define what is a generating facility versus a transmission facility?
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- Need to identify any requirements included in the survey that are already applicable to the generator owner or operator through other requirements not included in the survey.



- Do we need definition or new functional category of interconnection facility owner and/or operator?
- How do we relate the significance of the facility to the reliability of the bulk electric system

## **NERC Glossary**

**Bulk Electric System:** As defined by the Regional Reliability Organization, the electrical generation resources, transmission lines, interconnections with neighboring systems, and associated equipment, generally operated at voltages of 100 kV or higher. Radial transmission facilities serving only load with one transmission source are generally not included in this definition.

**Element:** Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element may be comprised of one or more components.

**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.)

**Generator Operator:** The entity that operates generating unit(s) and performs the functions of supplying energy and Interconnected Operations Services.

**Generator Owner:** Entity that owns and maintains generating units.

**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.

**Transmission Line:** A system of structures, wires, insulators and associated hardware that carry electric energy from one point to another in an electric power system. Lines are operated at relatively high voltages varying from 69 kV up to 765 kV, and are capable of transmitting large quantities of electricity over long distances.

**Transmission Operator:** The entity responsible for the reliability of its “local” transmission system, and that operates or directs the operations of the transmission facilities.

**Transmission Owner:** The entity that owns and maintains transmission facilities.

## **Statement of Compliance Registry Criteria**

- III. Entities identified in Part II above as being subject to registration as an LSE, DP, GO, GOP, TO, or TOP should be excluded from the registration list for these functions if they do not meet any of the criteria listed below:

III(c) Generator Owner/Operator:

III.c.1 Individual generating unit > 20 MVA (gross nameplate rating) and is directly connected to the bulk power system, or;

III.c.2 Generating plant/facility > 75 MVA (gross aggregate nameplate rating) or when the entity has responsibility for any facility consisting of one or more units that are connected to the bulk power system at a common bus with total generation above 75 MVA gross nameplate rating, or;

III.c.3 Any generator, regardless of size, that is a blackstart unit material to and designated as part of a transmission operator entity's restoration plan, or;

III.c.4 Any generator, regardless of size, that is material to the reliability of the bulk power system. [Exclusions:

*A generator owner/operator will not be registered based on these criteria if responsibilities for compliance with approved NERC reliability standards or associated requirements including reporting have been transferred by written agreement to another entity that has registered for the appropriate function for the transferred responsibilities, such as a load-serving entity, G&T cooperative or joint action agency as described in Sections 501 and 507 of the NERC Rules of Procedure.*

*As a general matter, a customer-owned or operated generator/generation that serves all or part of retail load with electric energy on the customer's side of the retail meter may be excluded as a candidate for registration based on these criteria if (i) the net capacity provided to the bulk power system does not exceed the criteria above or the Regional Entity otherwise determines the generator is not material to the bulk power system and (ii) standby, back-up and maintenance power services are provided to the generator or to the retail load pursuant to a binding obligation with another generator owner/operator or under terms approved by the local regulatory authority or the Federal Energy Regulatory Commission, as applicable.]*

III(d) Transmission Owner/Operator:

III.d.1 An entity that owns/operates an integrated transmission element associated with the bulk power system 100 kV and above, or lower voltage as defined by the Regional Entity necessary to provide for the reliable operation of the interconnected transmission grid; or

III.d.2 An entity that owns/operates a transmission element below 100 kV associated with a facility that is included on a critical facilities list that is defined by the Regional Entity.

*[Exclusion: A transmission owner/operator will not be registered based on these criteria if responsibilities for compliance with approved NERC reliability standards or associated requirements including reporting have been transferred by written agreement to another entity that has registered for the appropriate function for the transferred responsibilities, such as a load-serving entity, G&T cooperative or joint action agency as described in Sections 501 and 507 of the NERC Rules of Procedure.]*

## **NERC Functional Model Version 4**

### **Function — Transmission Operations**

#### **Definition**

Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.

#### **Tasks**

1. Monitor and provide telemetry (as needed) of all reliability-related parameters within the reliability area.
2. Monitor the status of, and deploy, facilities classed as transmission assets, which may include the transmission lines connecting a generating plant to the transmission system, associated protective relaying systems and Special Protection Systems.
3. Provide transmission maintenance schedules.
4. Develop system limitations such as System Operating Limits and Total Transfer Capabilities, and operate within those limits.
5. Develop and implement emergency procedures.
6. Develop and implement system restoration plans.
7. Operate within established Interconnection Reliability Operating Limits.
8. Perform reliability analysis (actual and contingency) for the Transmission Operator Area.
9. Adjust flow control devices within the transmission area for those Interchange Transactions that include these facilities in the transmission path.
10. Deploy reactive resources to maintain transmission voltage within defined limits.

### **Responsible Entity — Transmission Operator**

#### **Introduction to the Transmission Operator**

The Transmission Operator is responsible for the real-time operating reliability of the transmission assets under its purview, which is referred to as the Transmission Operator Area. The Transmission Operator has the authority to take certain actions to ensure that its Transmission Operator Area operates reliably.

The Transmission Operator and Reliability Coordinator have similar roles with respect to transmission operations, but different scopes. The Transmission Operator scope is narrower than the Reliability Coordinator, and the Transmission Operator does not necessarily “see” very far beyond its own boundaries. Therefore, the Transmission Operator can calculate System Operating Limits, but the Model does not require the Transmission Operator to calculate Interconnection Reliability Operating Limits, which requires the wider scope of the Reliability Coordinator.

#### **Relationships with Other Responsible Entities**

##### Ahead of Time

1. Coordinates restoration plans with Reliability Coordinator, Transmission Operators, Balancing Authorities, and Distribution Providers.

2. Receives maintenance requirements and construction plans and schedules from the Transmission Owners and Generation Owners.
3. Receives Interconnection Reliability Operating Limits as established by the Reliability Coordinator.
4. Receives reliability evaluations from the Reliability Coordinator.
5. Develops agreements with adjacent Transmission Operators for joint transmission facilities.
6. Revises transmission maintenance plans as directed by the Reliability Coordinator and as permitted by agreements.
7. Defines Total Transfer Capabilities and System Operating Limits based on facility information provided by the Transmission Owners and Generator Owners and assistance from Reliability Coordinator.
8. Determines amount required and arranges for reliability-related services from Generator Operators to ensure voltage support (e.g., reactive supply from generation resources) in coordination with (or under the direction of) the Reliability Coordinator.
9. Develops contingency plans, and monitors operations of the transmission facilities within the Transmission Operator Area control and as directed by the Reliability Coordinator.
10. Provides maintenance schedules and construction plans to Reliability Coordinator and Transmission Planner.
11. Provides facility and operating information to the Reliability Coordinator.
12. Provides to the Transmission Planner information on the capability to curtail (reduce) and shed load during emergencies.
13. Provides Total Transfer Capabilities and System Operating Limits to, and coordinates Available Transfer Capability with, Transmission Service Provider.
14. Receives operating and availability status of generating units from Generation Operators including status of automatic voltage regulators.
15. Develops operating agreements or procedures with Transmission Owners.

#### Real Time

16. Coordinates load shedding with, or as directed by, the Reliability Coordinator.
17. Provides real-time operations information to the Reliability Coordinator and Balancing Authority.
18. Notifies Generator Operators of transmission system problems (e.g., voltage limitations or equipment overloads that may affect generator operations).
19. Requests Reliability Coordinator to assist in mitigating equipment overloads. (e.g., redispatch, transmission loading relief).
20. Deploys reactive resources from Transmission Owners and Generator Owners to maintain acceptable voltage profiles.
21. Directs Distribution Providers to shed load if needed to ensure reliability within the Transmission Operator Area.
22. Implements flow control device operations for those ties under the Transmission Operator's purview as directed by the Balancing Authorities or Reliability Coordinator.
23. Receives reliability alerts from Reliability Coordinator.

24. Directs Balancing Authorities and Distribution Providers to implement system restoration plans.

## **Function — Transmission Ownership**

### **Definition**

Owns and provides for the maintenance of transmission facilities.

### **Tasks**

1. Develop interconnection agreements.
2. Establish ratings of transmission facilities.
3. Authorize maintenance of transmission facilities and rights-of-way.
4. Design and install owned facilities classified as transmission and obtain associated rights-of-way.
5. Design and authorize maintenance of transmission protective relaying systems and Special Protection Systems.

## **Responsible Entity — Transmission Owner**

### **Relationships with Other Responsible Entities**

1. Coordinates with Transmission Planners and the Planning Coordinator, Generator Owners, other Transmission Owners, and Load-Serving Entities desiring to connect with the bulk power
2. Receives approved transmission expansion plans from the Transmission Planner.
3. Develops agreements or procedures with the Transmission Service Providers.
4. Develops operating agreements or procedures with the Transmission Operators, Reliability Coordinators and Distribution Providers.
5. Develops agreements with adjacent Transmission Owners for joint transmission facilities.
6. Provides transmission expansion plans and changes to the Planning Coordinator and Transmission Planners.
7. Provides transmission facility ratings to Transmission Operators, Reliability Coordinators, Transmission Service Providers, Distribution Providers, Transmission Planners, and Planning Coordinator.
8. Provides construction plans and schedules to the Transmission Operator, and Transmission Planner.
9. Provides maintenance plans and schedules to the Transmission Operator and Transmission Planner.
10. Develops interconnection agreements with the Distribution Providers and Generation Owners for connecting to the bulk power system.
11. Provides reactive resources to Transmission Operators.

## **Function — Generator Operation**

### **Definition**

Operates generating unit(s) to provide real and reactive power.

### **Tasks**

1. Formulate daily generation plan.
2. Report operating and availability status of units and related equipment, such as automatic voltage regulators.
3. Develop annual maintenance plan for generating units and perform the day-to-day generator maintenance.
4. Operate generators to provide real and reactive power or reliability-related services per contracts or arrangements.
5. Monitor the status of facilities classed as generating assets.
6. Support Interconnection frequency.

## **Responsible Entity — Generator Operator**

### **Relationships with Other Responsible Entities**

#### Ahead of Time

1. Provides generation commitment plans to the Balancing Authority.
2. Provides Balancing Authority and Transmission Operators with requested amount of reliability-related services.
3. Provides operating and availability status of generating units to Balancing Authority and Transmission Operators for reliability analysis.
4. Reports annual maintenance plan for generating units to Reliability Coordinator, Balancing Authority and Transmission Operators.
5. Reports status of automatic voltage regulators to Transmission Operators.
6. Provides operational data to Reliability Coordinator.
7. Revises generation maintenance plans per directive of Reliability Coordinator.
8. Receives reliability analyses from Reliability Coordinator.
9. Receives notice from Purchasing-Selling Entity if Interchange Transaction approved or denied.
10. Receives reliability alerts from Reliability Coordinator.
11. Receives notification of transmission system problems from Transmission Operators.

#### Real Time

12. Provides real-time operating information to the Transmission Operators and the required Balancing Authority.
13. Adjusts real and reactive power as directed by the Balancing Authority and Transmission Operators.



## **Function — Generator Ownership**

### **Definition**

Owns and provides for maintenance of generating facilities.

### **Tasks**

1. Establish generating facilities ratings, limits, and operating requirements.
2. Design and authorize maintenance of generation plant protective relaying systems, protective relaying systems on the transmission lines connecting the generation plant to the transmission system, and Special Protection Systems.
3. Authorize maintenance of owned facilities classified as generating assets.
4. Provide verified generating facility performance characteristics / data.

## **Responsible Entity — Generator Owner**

### **Relationships with Other Responsible Entities**

1. Provides generator information to the Transmission Operator, Reliability Coordinator, Balancing Authority, Transmission Planner, and Resource Planner.
2. Provides unit maintenance schedules and unit retirement plans to the Transmission Operator, Balancing Authority, Transmission Planner, and Resource Planner.
3. Develops an interconnection agreement with Transmission Owner on a facility basis.
4. Receives approval or denial of transmission service request from Transmission Service Provider.
5. Provides reliability related services to Purchasing-Selling Entity pursuant to agreement.

## **FERC Order No. 2003-C: Standard Large Generator Interconnection Procedures**

**Generating Facility** shall mean Interconnection Customer's device for the production of electricity identified in the Interconnection Request, but shall not include the Interconnection Customer's Interconnection Facilities.

**Interconnection Customer** shall mean any entity, including the Transmission Provider, Transmission Owner or any of the Affiliates or subsidiaries of either, that proposes to interconnect its Generating Facility with the Transmission Provider's Transmission System.

**Interconnection Customer's Interconnection Facilities** shall mean all facilities and equipment, as identified in Appendix A of the Standard Large Generator Interconnection Agreement, that are located between the Generating Facility and the Point of Change of Ownership, including any modification, addition, or upgrades to such facilities and equipment necessary to physically and electrically interconnect the Generating Facility to the Transmission Provider's Transmission System. Interconnection Customer's Interconnection Facilities are sole use facilities.

**Interconnection Facilities** shall mean the Transmission Provider's Interconnection Facilities and the Interconnection Customer's Interconnection Facilities. Collectively, Interconnection Facilities include all facilities and equipment between the Generating Facility and the Point of Interconnection, including any modification, additions or upgrades that are necessary to physically and electrically interconnect the Generating Facility to the Transmission Provider's Transmission System. Interconnection Facilities are sole use facilities and shall not include Distribution Upgrades, Stand Alone Network Upgrades or Network Upgrades.

**Point of Change of Ownership** shall mean the point, as set forth in Appendix A to the Standard Large Generator Interconnection Agreement, where the Interconnection Customer's Interconnection Facilities connect to the Transmission Provider's Interconnection Facilities.

**Point of Interconnection** shall mean the point, as set forth in Appendix A to the Standard Large Generator Interconnection Agreement, where the Interconnection Facilities connect to the Transmission Provider's Transmission System.

**Transmission Provider** shall mean the public utility (or its designated agent) that owns, controls, or operates transmission or distribution facilities used for the transmission of electricity in interstate commerce and provides transmission service under the Tariff. The term Transmission Provider should be read to include the Transmission Owner when the Transmission Owner is separate from the Transmission Provider.

**Transmission Provider's Interconnection Facilities** shall mean all facilities and equipment owned, controlled, or operated by the Transmission Provider from the Point of Change of Ownership to the Point of Interconnection as identified in Appendix A to the

Standard Large Generator Interconnection Agreement, including any modifications, additions or upgrades to such facilities and equipment. Transmission Provider's Interconnection Facilities are sole use facilities and shall not include Distribution Upgrades, Stand Alone Network Upgrades or Network Upgrades.