

## Meeting Notes Project 2010-07 Generator Requirements at the Transmission Interface

November 30, 2011 | 1:00 p.m.–5:00 p.m. ET  
December 01, 2011 | 8:00 a.m.–5:00 p.m. ET

Washington, DC

### Administrative

NERC Coordinator Mallory Huggins initiated the meeting, led group introductions, reviewed the NERC Antitrust Compliance Guidelines, and reminded the group that the meeting was open and public.

Members		
Scott Helyer, Tenaska (Chair)	Louis Slade, Dominion (Vice Chair)	Sam Dwyer, Ameren
Steve Enyeart, BPA	Bob Goss, SERC (via conference call)	Rick Terrill, Luminant Power
Mallory Huggins, NERC (Coordinator)		
Observers		
Susan Morris, FERC (on the phone)	Ellen Oswald	Stephanie Schmidt, FERC
John Seelke, PSEG		

### Review Meeting Goals

Mallory and Vice Chair Louis Slade led a discussion of the goals for the meeting: to review the comments submitted on FAC-001-1, FAC-003-3, FAC-003-X, and PRC-004-2a; to respond to stakeholder comments and make conforming standard changes; to determine how to handle NERC staff comments (with respect to the draft compliance directive) and FERC’s Milford and Cedar Creek orders; and to decide on next steps.

### Comment Report Review and Proposed Standard Changes

1. The Standard Drafting Team (SDT) read through the comment report and Louis’s proposed answers for many of the questions. Ballot results and comments indicated majority support for the proposed modifications to the standards, so the SDT determined that the only new changes necessary were clarifying ones or corrections of typos.
2. In FAC-001-1, the SDT corrected a typo in the Applicability section 4.2.1 to change “within” to “with”; corrected a typo in the VSLs for R3 to ensure that parts 3.1.1 through 3.1.16 are referenced,

rather than just 3.1.1 through 3.1.6; and changed references to “Transmission System” to “interconnected Transmission systems” to ensure consistency with the language elsewhere in the standard and in FAC-002-1.

3. In FAC-003-X and FAC-003-3, the SDT added a clarifying reference to line of sight in the Generator Owner (GO) exemption in section 4.3.1. of both versions; corrected a typo in 4.3.1.2 of FAC-003-3; and changed “RE” to “Regional Entity” in 4.3.1 of FAC-003-X. To clarify the exemption, the SDT has modified 4.3.1 to include a reference to line of sight: “Overhead transmission lines (a) greater than one mile (1.609 kilometers) in length or (b) that do not have a clear line of sight from the origin of the line to the point of interconnection and are...” The SDT considered all comments submitted, and believes that this exemption now adequately addresses the reliability impact for a majority of the Facilities, while balancing the efforts necessary to support the standard from all entities.
4. In PRC-004-2.1, the SDT added a reference to the generator interconnection Facility to the data retention section of the standard (for consistency with the language in R2) and corrected a typo in the Version History.

### **Discussion of Other Inputs**

1. During the 45-day comment period, the SDT received comments from NERC staff encouraging the team to review additional standards. The SDT received similar comments from stakeholders suggesting that the team review the standards in the draft NERC compliance directive regarding generator lead lines and the Milford and Cedar Creek FERC orders. Some commenters offered their justification for why the SDT should not incorporate additional standards into its scope of work.
2. Based on these inputs, the SDT re-reviewed all standards discussed by NERC and FERC. With the exception of PRC-005, discussed below, the SDT continues to find clear and technical reliability-based reasons that support not adding GO and Generator Operator (GOP) requirements to additional standards and not requiring the GO or GOP to register as a Transmission Owner or Transmission Operator. However, to address stakeholder concern, the SDT expanded its technical justification document to include any standard or requirement cited by FERC in its Milford/Cedar Creek orders or by NERC in its draft compliance directive.
3. In its review of other standards, the SDT determined that the wording in R1 and R2 of PRC-005-1a requires the same explicit reference to a generator interconnection facility that was added in PRC-004-2.1 R2. The SDT is developing revisions to PRC-005-1a and will post them (separate from the recirculation ballot) soon.

**Next Steps**

1. The SDT believes that its proposed modifications are not substantive in nature, and thus FAC-001-1, FAC-003-3, FAC-003-X, and PRC-004-2.1 will be posted for recirculation ballot as soon as possible. The goal is to post and finish the recirculation ballot before the Holiday to try to get the standards before the Board of Trustees in February.
2. The SDT will ballot both versions of FAC-003, but will remind stakeholders that they should not vote as though they are choosing one or the other. The SDT plans to present FAC-003-3 alone to NERC's Board of Trustees, but it wants to have FAC-003-X ready to submit to the Board if, for some reason, neither FAC-003-2 nor FAC-003-3 are approved by FERC.

**Adjournment**