

Comment Report

Project Name: 2021-08 Modifications to FAC-008 | Draft 1
Comment Period Start Date: 9/5/2023
Comment Period End Date: 10/19/2023
Associated Ballots: 2021-08 Modifications to FAC-008 FAC-008-6 IN 1 ST
2021-08 Modifications to FAC-008 Implementation Plan IN 1 OT

There were 91 sets of responses, including comments from approximately 210 different people from approximately 123 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

- 1. Do you agree that the modification of Requirement R6 has clarified the meaning of “jointly owned” and clarified that Requirement R6 is a risk-based Requirement?**
- 2. Do you agree that the new Requirement R9 has clarified the meaning of “consistent” in relation to defining the processes?**
- 3. Do you agree that the modifications made in FAC-008-6 are cost effective?**
- 4. Do you agree that the Implementation Plan for revised FAC-008-6 is appropriate?**
- 5. Provide any additional comments for the standard drafting team to consider, if desired.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
DTE Energy - Detroit Edison Company	Adrian Raducea	5		DTE Energy - DTE Electric	Karie Barczak	DTE Energy - Detroit Edison Company	3	RF
					Adrian Raducea	DTE Energy - Detroit Edison	5	RF
					patricia ireland	DTE Energy	4	RF
WEC Energy Group, Inc.	Christine Kane	3		WEC Energy Group	Christine Kane	WEC Energy Group	3	RF
					Matthew Beilfuss	WEC Energy Group, Inc.	4	RF
					Clarice Zellmer	WEC Energy Group, Inc.	5	RF
					David Boeshaar	WEC Energy Group, Inc.	6	RF
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					John Nierenberg	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC

ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,RF,SERC,Texas RE,WECC	ACES Collaborators	Bob Soloman	Hoosier Energy Electric Cooperative	1	RF
					Kris Carper	Arizona Electric Power Cooperative, Inc.	1	WECC
					Jason Procuniar	Buckeye Power, Inc.	1,4	RF
					Jason Procuniar	Buckeye Power, Inc.	1,4	RF
					Jeremy Johnson	Prairie Power, Inc.	1,3	SERC
					Scott Berry	Wabash Valley Power Association	3	RF
Eversource Energy	Joshua London	1		Eversource	Joshua London	Eversource Energy	1	NPCC
					Vicki O'Leary	Eversource Energy	3	NPCC
MRO	Kendra Buesgens	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Christopher Bills	City of Independence Power & Light	3,5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc.	2	MRO
					Bryan Sherrow	Kansas City Board Of Public Utilities	1	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO

					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Shonda McCain	Omaha Public Power District	6	MRO
					George Brown	Acciona Energy North America	5	MRO
					Jaimin Patel	Saskatchewan Power Corporation	1	MRO
					Kimberly Bentley	Western Area Power Administration	1,6	MRO
					Jay Sethi	Manitoba Hydro	1,3,5,6	MRO
					Michael Ayotte	ITC Holdings	1	MRO
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Mark Garza	FirstEnergy-FirstEnergy	1,3,4,5,6	RF
					Stacey Sheehan	FirstEnergy - FirstEnergy Corporation	6	RF
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC
					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					Frank Lee	Pacific Gas and Electric Company	5	WECC

National Grid USA	Michael Jones	1		National Grid	Michael Jones	National Grid USA	1	NPCC
					Brian Shanahan	National Grid USA	3	NPCC
Southern Company - Southern Company Services, Inc.	Pamela Frazier	1,3,5,6	MRO,RF,SERC,Texas RE,WECC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC
					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Jim Howell, Jr.	Southern Company - Southern Company Generation	5	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Leslie Burke	Southern Company - Southern Company Generation	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC RSC	Gerry Dunbar	Northeast Power Coordinating Council	10	NPCC
					Alain Mukama	Hydro One Networks, Inc.	1	NPCC
					Deidre Altobell	Con Edison	1	NPCC
					Jeffrey Streifling	NB Power Corporation	1	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Stephanie Ullah-Mazzuca	Orange and Rockland	1	NPCC
					Michael Ridolfino	Central Hudson Gas & Electric Corp.	1	NPCC

Randy Buswell	Vermont Electric Power Company	1	NPCC
James Grant	NYISO	2	NPCC
John Pearson	ISO New England, Inc.	2	NPCC
Harishkumar Subramani Vijay Kumar	Independent Electricity System Operator	2	NPCC
Randy MacDonald	New Brunswick Power Corporation	2	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
David Burke	Orange and Rockland	3	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
David Kwan	Ontario Power Generation	4	NPCC
Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	1	NPCC
Glen Smith	Entergy Services	4	NPCC
Sean Cavote	PSEG	4	NPCC
Jason Chandler	Con Edison	5	NPCC
Tracy MacNicoll	Utility Services	5	NPCC
Shivaz Chopra	New York Power Authority	6	NPCC

					Vijay Puran	New York State Department of Public Service	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					David Kiguel	Independent	7	NPCC
					Joel Charlebois	AESI	7	NPCC
					Joshua London	Eversource Energy	1	NPCC
Ryan Strom	Ryan Strom		RF	Buckeye Power Group	Carl Spaetzel	Buckeye Power, Inc.	3	RF
					Jason Proconiar	Buckeye Power, Inc.	4	RF
					Kevin Zemanek	Buckeye Power, Inc.	5	RF
Dominion - Dominion Resources, Inc.	Sean Bodkin	5,6		Dominion	Connie Lowe	Dominion - Dominion Resources, Inc.	3	NA - Not Applicable
					Lou Oberski	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
					Larry Nash	Dominion - Dominion Virginia Power	1	NA - Not Applicable
					Rachel Snead	Dominion - Dominion Resources, Inc.	5	NA - Not Applicable
Shannon Mickens	Shannon Mickens		MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Ashley Stringer	Southwest Power Pool Inc.	2	MRO
					Debbie Currie	Southwest Power Pool Inc	2	MRO
					Brian Strickland	Southwest Power Pool Inc.	2	MRO

					Derek Hawkins	Southwest Power Pool Inc.	2	MRO
					Mia Wilson	Southwest Power Pool Inc.	2	MRO
					Margaret Quispe	Southwest Power Pool Inc.	2	MRO
					Randy Cleland	Southwest Power Pool Inc.	2	MRO
					Melissa Rinehart	Southwest Power Pool Inc.	2	MRO
					Matt Harward	Southwest Power Pool Inc.	2	MRO
					Scott Aclin	Southwest Power Pool Inc.	2	MRO
Stephen Whaite	Stephen Whaite			ReliabilityFirst Ballot Body Member and Proxies	Lindsey Mannion	ReliabilityFirst	10	RF
					Stephen Whaite	ReliabilityFirst	10	RF
Western Electricity Coordinating Council	Steven Rueckert	10		WECC Entity Monitoring	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
Tim Kelley	Tim Kelley		WECC	SMUD	Ryder Couch	Sacramento Municipal Utility District	5	WECC
					Foung Mua	Sacramento Municipal Utility District	4	WECC
					Wei Shao	Sacramento Municipal Utility District	1	WECC
					Nicole Looney	Sacramento Municipal Utility District	3	WECC
					Charles Norton	Sacramento Municipal Utility District	6	WECC
Associated Electric	Todd Bennett	3		AECI	Michael Bax	Central Electric Power	1	SERC

Cooperative, Inc.						Cooperative (Missouri)		
					Adam Weber	Central Electric Power Cooperative (Missouri)	3	SERC
					Stephen Pogue	M and A Electric Power Cooperative	3	SERC
					William Price	M and A Electric Power Cooperative	1	SERC
					Peter Dawson	Sho-Me Power Electric Cooperative	1	SERC
					Mark Ramsey	N.W. Electric Power Cooperative, Inc.	1	NPCC
					John Stickley	NW Electric Power Cooperative, Inc.	3	SERC
					Tony Gott	KAMO Electric Cooperative	3	SERC
					Micah Breedlove	KAMO Electric Cooperative	1	SERC
					Kevin White	Northeast Missouri Electric Power Cooperative	1	SERC
					Skyler Wiegmann	Northeast Missouri Electric Power Cooperative	3	SERC
					Ryan Ziegler	Associated Electric Cooperative, Inc.	1	SERC
					Brian Ackermann	Associated Electric Cooperative, Inc.	6	SERC
					Brad Haralson	Associated Electric Cooperative, Inc.	5	SERC

1. Do you agree that the modification of Requirement R6 has clarified the meaning of “jointly owned” and clarified that Requirement R6 is a risk-based Requirement?

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer No

Document Name

Comment

No, this will still be vague and subject to auditor subjectivity during enforcement. There continues to be disagreement on how far beyond its own system an entity must go to satisfy an auditor. In a most recent case, auditors were asking for equipment ratings of other entities' facilities and lines well beyond the audited entity's own equipment.

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1

Answer No

Document Name

Comment

WAPA understands the SDT rationale seeking to recognize that “joint-ownership” may imply a Facility comprised of Elements that are individually solely-owned by one or more owners, or may imply a Facility comprised of Elements that have shared ownership by one or more owners. If the SDT seeks to clarify and differentiate between shared ownership of a Facility and joint ownership of equipment comprising a Facility, the “Shared Ownership of Bulk Electric System Facilities” ERO Enterprise Endorsed Implementation Guidance (October 10, 2017) has a workable framework to better define these concepts.

WAPA believes the existing principle of FAC-008 is that each equipment owner must develop Equipment Ratings for the equipment they solely- or jointly-own consistent with their methodology, as well as participate with other owners of equipment in the Facility to determine the overall Facility Rating to respect the most-limiting Equipment Rating of equipment comprising the Facility. The proposed Requirement R6 modification, including the addition of Part 6.1, introduce more problems than it solves. Specifically, in Requirement R6:

- “BES Facilities” is unnecessarily redundant. The NERC Glossary of Terms definition of Facility already includes reference to BES.
- Reference to “accurately identifying” is ambiguous and problematic. This language should be removed.
- The requirement to identify the rating of the most Limiting Element(s) is redundant to the existing FAC-008-5 Requirement R3, Part 3.3 which already requires a Transmission Owner to have a Facility Ratings methodology that specifies that Facility Ratings shall respect the most-limiting applicable Equipment Rating of the individual equipment that comprise the Facility.

In Requirement R6, Part 6.1:

- The existing FAC-008-5 implicitly requires coordination between joint owners to establish Facility Ratings. In other words, any joint ownership in a Facility (whether joint ownership of one piece of equipment or joint ownership of the Facility where each entity solely owns each piece of equipment) demands that each sole- or joint equipment owner share most-limiting Equipment Rating information towards the establishment of the overall Facility Rating that respects “the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility” (Requirement R3, Part 3.3).
- The attempt to codify how coordination between joint owners will occur confusingly mixes Requirement R3, Part 3.4 obligations for Equipment Ratings with the different concept of Element. The SDT should consider that no inception of the FAC-008 Reliability Standard has included the term Element for good reason. Instead, FAC-008-5 Requirement R3 recognizes that the Transmission Owner, through its Facility Ratings methodology, is best positioned to demarcate the equipment comprising a Facility for which Equipment Ratings (not Element ratings) shall be determined. All references to “Element” should be replaced with suitable references to simply “equipment” or “equipment comprising a Facility.”
- An important NERC Rules of Procedure concept is that no registered entity may delegate its obligations to the Reliability Standards without a Joint Registration Organizations (JRO) or Coordinated Functional Registration (CFR) agreement. The requirement to “designate one owner to solely develop the most limiting Equipment Rating(s) for the Element(s)” appears to inappropriately delegate a Transmission Owner obligation to establish its Equipment Ratings. This should be removed.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

No

Document Name

Comment

The proposed SAR fails to distinguish between generating unit capability and thermal capability of the series path between generator and POI (point of interconnection). In transmission system modeling, parameters establishing unit capability are entirely separate from those establishing ratings of the connection facilities between the generator and the transmission grid. It is possible for a generating unit to be capable of an output greater than the rating of the facilities connecting the generator to the grid, and vice versa. Generator capabilities can be impacted by changes to the mechanical elements driving the generator. If a GO improves the capability of a unit, one needs to determine whether that increased capability can be safely transmitted to the grid. For that to be obtained, one also needs to know the electrical rating of the series path. As an example, and further demonstrating the sufficiency of the current standard, FAC-008 R1.1 states “Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.”

Likes 0

Dislikes 0

Response

Tammy Porter - Tammy Porter On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Tammy Porter

Answer No

Document Name

Comment

The statement does not clearly define what a “jointly owned” facility is. We look at “jointly owned facilities” from a contractual perspective. For any line connected to another entity, we have a clear demarcation between the facilities we own and the facilities owned by another entity.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer No

Document Name

Comment

WECC believes that while the proposed changes don't hurt anything, they do not solve anything either. It is our understanding that if all owners of a jointly owned facility agree on the boundaries, there is not a problem. Our understanding is that there is a problem when the definitions of a boundary are ambiguous and result in a determination by an auditor that a facility is jointly owned, and the entity defined the boundaries such that it is solely owned. Clarity on definition of boundaries would be helpful.

Additionally, unless the rating of all elements is determined, how can a most limiting element be identified.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer No

Document Name

Comment

-Duke Energy agrees with proposed R6 language but believes R6 as written does not clarify R6 as a risk-based approach requirement.

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl

Answer No

Document Name

Comment

AECl supports the additional clarity provided for jointly owned facilities, however this requirement has not been addressed from a risk based perspective as described in the SAR.

Demonstration of compliance requires an entity's field conditions, real-time models, near-term planning models, and long-term planning models to collectively and consistently align with an entities Facility Ratings methodology. As written, this requires 100% accurate field conditions and associated system models 100% of the time. Demonstration of compliance with this requirement has been unattainable by industry due to the immense scope of Facility applicability. Facility Ratings were not identified as a high risk profile in the 2023 RISC ERO Reliability Risk Priorities Report, mandatory requirements should reflect this analysis. Facility Ratings are definitely important as they are foundational to BES modeling, however AECl believes a similar approach as proposed in the draft R9 should be implemented for R6.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer No

Document Name

Comment

The statement: "...accurately identifying the rating of the most Limiting Element(s) in accordance with its associated Facility Ratings methodology..." This statement is ambiguous. Shouldn't all requirements requiring a rating, a measurement or a report be accurate?

The measurement for R6 states:

"...shall have evidence to show that its Facility Ratings accurately identify the rating of the most

Limiting Element(s) in accordance are consistent with the documentation for determining its

Facility Ratings..."

Adding "accurately identifying" does not add clarity to the requirement or make it risk based. It does add compliance confusion. How do you define "accurately identify"?

Suggest removing 'accurately identify' from the requirement and measurement. The MRO NSRF recommends the following:

R6: Each Transmission Owner and Generator Owner shall develop Facility Ratings for its solely and jointly owned BES Facilities as specified within its Facility Ratings methodology or

documentation for determining its Facility Ratings.

As written, R6.1 can be confusing and should be clarified.

For a BES Facility with two or more owners, all applicable entities that own a share of the

Facility shall coordinate development of a common Facility Rating and determine the owner of the common Facility Rating. The common Facility Rating shall incorporate the most limiting element across all the applicable entities. The common Facility Rating shall be communicated to all applicable entities.

Likes 2

Lincoln Electric System, 5, Millard Brittany; American Municipal Power, 5, Ritts Amy

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer

No

Document Name

Comment

WEC Energy Group support the comments of the MRO NSRF.

Likes 1

Lincoln Electric System, 5, Millard Brittany

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

No

Document Name

Comment

With PJM as our PC and the use of the MMWG base case, we currently rely on this process to be communicated via this channel. R6.1 should be clarified to include this communication conduit as a means of meeting this requirement.

The verbiage in the redline Requirement R6 is unclear and clarification is warranted. It implies that an Owner would now have to consider and assign limits to a Facility/circuit for Elements of another Owner, specifically in the case where the POI is the R1 boundary (GSU) and R2 equipment belongs to the TO. This implied change adds a coordination element and conflicts with the language in earlier Requirements. Requirements R1 thru R3 clearly define rating boundaries for applicable Owners, while R6 blurs those demarcation lines. The intent does not seem to be to add communication/coordination responsibilities between Owners across a POI, but the proposed R6 mods are ambiguous and can be interpreted that way as written.

Further, FirstEnergy also supports EEI's edit which states:

In the SAR, it states that the term “jointly owned” is to be clarified. Given the use of this term in other standards, it should be defined in the context of FAC-008. It is not sufficient to add language within subparts of Requirement R6. To address this concern, Jointly Owned should be defined in FAC-008. Language contained in Requirement R6 could be used for this definition (see below):

Jointly Owned BES Facility: Any BES Facility, subject to FAC-008, that is not owned in its entirety by a single responsible entity.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer

No

Document Name

Comment

In the SAR, it states that the term “jointly owned” is to be clarified. Given the use of this term in other standards, it should be defined in the context of FAC-008. It is not sufficient to add language within subparts of Requirement R6. To address this concern, Jointly Owned should be defined in FAC-008. Language contained in Requirement R6 could be used for this definition (see below):

Jointly Owned BES Facility: Any BES Facility, subject to FAC-008, that is not owned in its entirety by a single responsible entity.

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer

No

Document Name

Comment

The new R6 item, “For Element(s) with multiple owners, the owners shall designate one owner to solely develop the most limiting Equipment Rating(s) for the Element(s),” is unproductive and burdensome, and should be inapplicable for radial outflows of power from a generation unit to the TO’s system. A GO and the TO often co-own the HV spans from the GSUs to the TO’s switchyard, for example, with the boundary being at the generation plant fence line. The rating of this line is calculated using IEEE-738, based on user-specific values for maximum temperature, which derive in turn from equipment life expectations. The TO’s goal in this respect may differ from that of the GO, which is immaterial so long as both parties’ values exceed the maximum power output of the generator. There is no problem with the GO calculating an HV span rating that has X% safety margin while the TO says that it’s Y%.

The word “accurately” should be deleted from R6, because it tasks auditors with judgments that are subjective in nature unless following rigorous principles that ought to be communicated up-front. GOs have always developed ratings for FAC-008 to the best of their ability (mostly nameplate data),

and if NERC has some alternative, better means of doing so in mind they should present their methodology in FAC-008-6 rather than leaving it until the time of an audit for GOs to learn what FAC-008 accuracy expectations are.

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer

No

Document Name

Comment

Tacoma Power supports the MRO NSRF comments.

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer

No

Document Name

Comment

The modifications have not clarified that the standard is risk-based. As written, the term “accurate” instead of “consistent” could still lead to the standard being interpreted with no-tolerance which is not a risk-based approach.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer

No

Document Name

Comment

No; the requirement, as written, will be more ambiguous for the use of "Facility" in the revised standard. The current NERC Glossary defines "Facility" as a set electrical equipment that operates as a single BES element. R6.1 has incorrectly applied Facility, re-defining it as electrical Elements installed within a common geographic boundary. In other words, Facility becomes the ground where the electrical Elements are mounted. The determination who owns the "Facility in its entirety" should remain tied to the existing NERC Glossary definition. When the BES elements are solely owned by one entity and ownership changes at an electrical line of demarcation, such as a point of interconnection, this is no Joint ownership in the application of the Standard. In the Technical Rationale, Scenario 1 is in direct conflict with the current definition of Facility. Rather it implies that adjacent owners meet the terminology of "jointly-owned". If that is the intent, this terminology must be explicitly defined. Perhaps it would be better to define this as a Point of Interconnection demarcation and remove the terminology "jointly owned". In addition, radial interconnecting feeds to a generating unit, including circuit breakers and disconnect switches, should have Facility ratings strictly tied to the applicable generating unit, rather than to the Transmission Owner's Facility Rating, regardless of their physical location. This is consistent with the NERC Glossary definition.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer

No

Document Name

Comment

No; the requirement, as written, will be more ambiguous for the use of "Facility" in the revised standard. The current NERC Glossary defines "Facility" as a set electrical equipment that operates as a single BES element. R6.1 has incorrectly applied Facility, re-defining it as electrical Elements installed within a common geographic boundary. In other words, Facility becomes the ground where the electrical Elements are mounted. The determination who owns the "Facility in its entirety" should remain tied to the existing NERC Glossary definition. When the BES elements are solely owned by one entity and ownership changes at an electrical line of demarcation, such as a point of interconnection, this is not Joint ownership in the application of the Standard. In the Technical Rationale, Scenario 1 is in direct conflict with the current definition of Facility. Rather it implies that adjacent owners meet the terminology of "jointly-owned". If that is the intent, this terminology must be explicitly defined. Perhaps it would be better to define this as a Point of Interconnection demarcation and remove the terminology "jointly owned". In addition, radial interconnecting feeds to a generating unit, including circuit breakers and disconnect switches, should have Facility ratings strictly tied to the applicable generating unit, rather than to the Transmission Owner's Facility Rating, regardless of their physical location. This is consistent with the NERC Glossary definition.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer

No

Document Name

Comment

Eversource is in support of EEI's comments.

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

No

Document Name

Comment

Black Hills Corporation agrees with EEI and NAGF comments.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer

No

Document Name

Comment

Black Hills Corporation agrees with EEI and NAGF comments.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

No

Document Name

Comment

Black Hills Corporation agrees with EEI and NAGF comments.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

No

Document Name

Comment

Black Hills Corporation agrees with EEI and NAGF comments.

Likes 0

Dislikes 0

Response

Israel Perez - Israel Perez On Behalf of: Mathew Weber, Salt River Project, 3, 1, 6, 5; Sarah Blankenship, Salt River Project, 3, 1, 6, 5; Thomas Johnson, Salt River Project, 3, 1, 6, 5; Timothy Singh, Salt River Project, 3, 1, 6, 5; - Israel Perez

Answer

No

Document Name

Comment

The SDT has adjusted the requirement to now allow for multiple ratings for the same asset. This in alignment with FERC 881 has the potential to create reliability issues as the Facility rating will be the basis for the AAR. For jointly owned assets a single utility needs to assert the Facility rating and communicate that to owners.

Likes 0

Dislikes 0

Response

David Rivera - New York Power Authority - 3

Answer

No

Document Name

Comment

Regarding R6.1 The entity responsible for coordinating the final most limiting rating should be ISO/RTO which is in conflict with the proposed requirement assigning the responsibility to facility owners.

NYPA recommends including precise definitions for "Split ownership" and "Joint ownership" in the NERC Glossary of terms to ensure a uniform understanding across the industry.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer

No

Document Name

Comment

AESCE recommends that jointly owned be defined as an official term in the NERC glossary or within the Standard. There is a lot of ambiguity in the industry with this term and that leads to confusion. Especially when two interconnecting entities define it differently. Diagrams and illustrations of jointly owned would also be very helpful in applying the term consistently across the industry.

The addition of "accurately identifying the rating of the most Limiting Element(s)" does clarify that R6 is a risk-based requirement. However, the word "accurately" should be omitted. Any requirement is applied accurately to the best of an entity's knowledge and ability. Adding this term will lead to more confusion during audits.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

No

Document Name

Comment

The SDT has proposed a definition of "jointly owned" to address the SAR concern for uncertainty in the responsibilities and the development of a single Facility Rating. However, the "clarification" that now includes two different scenarios of "jointly owned," adds even more ambiguity and potentially interferes with the contractual rights of parties with respect to joint ownership of facilities. In addition, it resides in the supporting Technical Rational document which has no regulatory force and is not defined in the Standard draft nor proposed to be added to the NERC Glossary of Terms and therefore introduces more ambiguity with respect to compliance with the Standard. If the goal is to bring clarity to the Standard and consistency in interpretation, then the wording in the Technical Rationale needs to be clarified so that it does not interfere with parties' contractual ownership arrangements and/or added to the NERC Glossary of Terms and "upper cased" in the Standard. In addition, the SDT has introduced additional burden to those GOs that currently have an R2 rating. From the Technical Rationale for Requirement R6 the SDT proposes two scenarios of "jointly owned" Scenario 1: Split ownership- Entities have shared ownership of a Facility where ownership of specific Elements that make up the Facility are solely owned by one entity and ownership changes over a line of demarcation. Scenario 2: Joint ownership- Entities share ownership of individual Element(s) For Scenario 1, this interpretation of the definition of joint ownership would have a significant impact on generating units that currently have a R2 rating from the high side of the main power transformer to the point of interconnection with the transmission entity (if a different entity from the GO), under the new 'split ownership' definition, the boundary or end point for the GO R2 Facility Rating would have to be re-evaluated and will require working with the

TO to validate or develop a new R2. The GO may be required to adopt a new methodology for Facility Ratings which will now be subject to audit beyond the contractual ownership and POI. Also, recommend removing the word “accurately” from the revised R6. The word “accurately” is defined as “correct in all details, exactly”. To meet the requirements of any NERC Standard the action is expected to be performed as correctly as possible. The word “accurately” is implied and not necessary in the wording of the Requirement.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

No

Document Name

Comment

The SDT has proposed a definition of “jointly owned” to address the SAR concern for uncertainty in the responsibilities and the development of a single Facility Rating. However, the “clarification” that now includes two different scenarios of “jointly owned,” adds even more ambiguity and potentially interferes with the contractual rights of parties with respect to joint ownership of facilities. In addition, it resides in the supporting Technical Rational document which has no regulatory force and is not defined in the Standard draft nor proposed to be added to the NERC Glossary of Terms and therefore introduces more ambiguity with respect to compliance with the Standard. If the goal is to bring clarity to the Standard and consistency in interpretation, then the wording in the Technical Rationale needs to be clarified so that it does not interfere with parties’ contractual ownership arrangements and/or added to the NERC Glossary of Terms and “upper cased” in the Standard.

In addition, the SDT has introduced additional burden to those GOs that currently have an R2 rating. From the Technical Rationale for Requirement R6 the SDT proposes two scenarios of “jointly owned”

Scenario 1: Split ownership- Entities have shared ownership of a Facility where ownership of specific Elements that make up the Facility are solely owned by one entity and ownership changes over a line of demarcation.

Scenario 2: Joint ownership- Entities share ownership of individual Element(s)

For Scenario 1, this interpretation of the definition of joint ownership would have a significant impact on generating units that currently have a R2 rating from the high side of the main power transformer to the point of interconnection with the transmission entity (if a different entity from the GO), under the new ‘split ownership’ definition, the boundary or end point for the GO R2 Facility Rating would have to be re-evaluated and will require working with the TO to validate or develop a new R2. The GO may be required to adopt a new methodology for Facility Ratings which will now be subject to audit beyond the contractual ownership and POI.

Also, recommend removing the word “accurately” from the revised R6. The word “accurately” is defined as “correct in all details, exactly”. To meet the requirements of any NERC Standard the action is expected to be performed as correctly as possible. The word “accurately” is implied and not necessary in the wording of the Requirement.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies

Answer

No

Document Name

Comment

Both options for the development of common Facility Ratings for jointly owned Facilities are clarifying and helpful. Compliance with the revised R6 would still require that a coordinated common overall Facility Rating be materially correct. RF supports the proposed changes regarding "jointly owned".

On the other hand, correct facility ratings are the basis for operational and planning studies performed on the Bulk Electric System and any errors introduce reliability risk.

Regarding the risk-based clarification, inherent in the proposed requirement to accurately identify the rating of the most Limiting Element(s) is an implied requirement to accurately identify the identity of the most Limiting Element. As such, applicable entities will need to continue to be prepared to demonstrate that the other equipment comprising the Facility is not most limiting in accordance with its Facility Ratings methodology or documentation. However, the proposed revision to R6 is such that omissions, discrepancies, and deficiencies in documentation of non-limiting Equipment Ratings would not be construed as R6 violations but will rather trigger the internal process developed under R9. And in its current form, R9 is inadequate, and therefore, as a whole, the proposed revisions inadequately address the potential risk posed by inaccurate Equipment Ratings.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer

No

Document Name

Comment

Dominion Energy supports EEI comments. In addition, Dominion energy is of the opinion that while R6 has added some clarity, there is continued concern that Tos have the ability to obtain ratings from neighboring TOs outside of our RTO footprint and what methodologies these TOs are using.

Likes 0

Dislikes 0

Response

Gary Trezza - Long Island Power Authority - 1 - NPCC

Answer	No
Document Name	
Comment	
<p>The Technical Rationale bulletin gave an explanation of the rationale for the R6 addition, which is to clarify the "Split ownership" and "Joint ownership" responsibilities. Please consider using these two terms within R6.1 to make it clearer.</p>	
Likes 0	
Dislikes 0	
Response	
<p>Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro</p>	
Answer	No
Document Name	
Comment	
<p>BC Hydro appreciates the drafting team efforts, the opportunity to comment, and offers the following.</p> <ol style="list-style-type: none"> 1. BC Hydro believes that each owner is responsible to derive Ratings for their equipment comprising a jointly owned BES Facility and does not consider that reviewing adjacent entities' evidence needs to be part of the compliance obligations under Requirement R6, Part 6.1. BC Hydro requests that the drafting team clarifies the compliance evidence expectations for "coordination" of jointly owned BES Facilities and whether gathering rating evidence for other entities Elements is expected from drafting team's perspective. 2. The Technical Rationale states under the Rationale for Requirement R9 heading that "This allows entities the freedom to make necessary corrections to Equipment Ratings that do not affect the most Limiting Element within their own process without the administrative overhead of self-reporting". However, based on Requirement R6 wording as drafted, an entity could be found noncompliant for not having Facility Ratings developed in accordance with the R1 documentation or R2 and/or R3 methodology regardless of the type of discrepancy found. Requirement R9 as drafted only asks for a process to correct discrepancies, the wording doesn't give an out for not-self-reporting discrepancies that don't impact the overall Facility rating. BC Hydro recommends that any exceptions or provisions be codified within the wording of the Standard instead of relying on Technical Rationale's and webinars to eliminate potential confusion during enforcement. 3. In Requirement R6, the use of the term "accurately" is subjective and could create confusion on the compliance expectations. BC Hydro suggests that the use of accurately is not required as long as an entity identifies the equipment that is most limiting when deriving the Facility Ratings, and its Rating is determined in accordance with R1 documentation and R2 and/or R3 methodology. 4. In Requirement R6, the use of the NERC Glossary term Limiting Element appears to expand the scope from Equipment Ratings to other contingency-based operational limitations per the definition. BC Hydro does not believe this is appropriate and as R1 documentation and R2 and/or R3 methodology already speaks to limiting Equipment, the he Glossary term Limiting Element should be deleted from R6. 	
Likes 0	
Dislikes 0	
Response	

Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1**Answer** No**Document Name****Comment**

In the SAR, it states that the term “jointly owned” is to be clarified. Given the use of this term in other standards, it should be defined in the context of FAC-008. It is not sufficient to add language within subparts of Requirement R6. To address this concern, Jointly Owned should be defined in FAC-008. Language contained in Requirement R6 could be used for this definition (see below):

Jointly Owned BES Facility: Any BES Facility, subject to FAC-008, that is not owned in its entirety by a single responsible entity.

Likes 0

Dislikes 0

Response**Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1****Answer** No**Document Name****Comment**

AEPC signed on to ACES comments:

We agree that the proposed modification to Requirement R6 has clarified the meaning of “jointly owned”.

We do not agree that the proposed modification to Requirement R6 clarifies that it is a risk-based requirement. Our main concern with the proposed language is the inclusion of the phrase “accurately identifying the rating of the most Limiting Element(s)...”. Who determines if the most Limiting Element(s) is “accurately identified” and what is the metric for determining such? We recommend removing phrase “accurately”.

Likes 0

Dislikes 0

Response**Ryan Strom - Ryan Strom On Behalf of: Carl Spaetzel, Buckeye Power, Inc., 4, 3, 5; Jason Procuniar, Buckeye Power, Inc., 4, 3, 5; Kevin Zemanek, Buckeye Power, Inc., 4, 3, 5; - Ryan Strom, Group Name Buckeye Power Group****Answer** No**Document Name****Comment**

We agree that the proposed modification to Requirement R6 has clarified the meaning of “jointly owned”. We do not agree that the proposed modification to Requirement R6 clarifies that it is a risk-based requirement.

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer

No

Document Name

Comment

The term "jointly owned" is still a bit ambiguous. For instance, it leaves us still questioning the ownership of the equipment that resides in one TOP's facility (let's say a substation) that is responsible for the operation of TOP's equipment (let's say transmission lines) that does not own the facility. It implies that multiple entities have legal liability associated with the equipment in question. For example, if a "jointly owned" transmission line fails then both parties have a legal responsibility associated with the failure and possible financial obligation to repair said transmission line. For example, if equipment in a California wildfire was "jointly owned," multiple utilities may be considered liable for the damage caused by said equipment. We believe a more accurate phrase for this requirement would be "electrically connected equipment that may impact another entity". An example would be a wave trap owned by Company A on the other end of a transmission line owned by Company B that is the most limiting factor impacting the rating of Company B's transmission line.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

No

Document Name

Comment

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer	No
Document Name	
Comment	
<p>The statement: "...accurately identifying the rating of the most Limiting Element(s) in accordance with its associated Facility Ratings methodology..." This statement is ambiguous. Shouldn't all requirements requiring a rating, a measurement or a report be accurate?</p> <p>The measurement for R6 states:</p> <p>"...shall have evidence to show that its Facility Ratings accurately identify the rating of the most. Limiting Element(s) in accordance are consistent with the documentation for determining its Facility Ratings..."</p> <p>Adding "accurately identifying" does not add clarity to the requirement or make it risk based. It does add compliance confusion. How do you define "accurately identify"?</p> <p>Suggest removing 'accurately identify' from the requirement and measurement.</p> <p>R6: Each Transmission Owner and Generator Owner shall develop Facility Ratings for its solely and jointly owned BES Facilities as specified within its Facility Ratings methodology or documentation for determining its Facility Ratings.</p> <p>As written, R6.1 can be confusing and should be clarified.</p> <p>For a BES Facility with two or more owners, all applicable entities that own a share of the Facility shall coordinate development of a common Facility Rating and determine the owner of the common Facility Rating. The common Facility Rating shall incorporate the most limiting element across all the applicable entities. The common Facility Rating shall be communicated to all applicable entities.</p> <p>added for discussion –</p> <p>'Jointly owned' is not a defined term.</p> <p>Standard Process Manual, Appendix 3A – 2.0 elements of a Reliability Standard</p> <p>2.4 Types of Reliability Requirements</p> <p>Risk-based Requirements define actions by one or more entities that reduce a stated risk to the reliability of the Bulk Power System and can be measured by evaluating a particular product or outcome resulting from the required actions. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the Bulk Power System.</p>	
Likes 0	

Dislikes 0

Response

Hillary Creurer - Allele - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power supports MRO's NERC Standards Review Forum's (NSRF) comments.

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer No

Document Name

Comment

The modification to Requirement R6 has not clarified the meaning of "jointly owned" and may still result in differing interpretations by auditors, Transmission Owners, and Generator Owners. The Standard would benefit from a proper definition that clarifies how facility boundaries are to be demarcated.

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer No

Document Name

Comment

Southern Indiana Gas & Electric Company (SIGE) does not agree that the modification of Requirement R6 clarifies the meaning of "jointly owned". SIGE supports EEI's proposed "Jointly Owned BES Facility" definition.

With regards to the proposed sub-requirement R6.1, SIGE recommends the following changes:

- Remove the two bulleted sections under R6.1

- Revise the R6.1 language:

R6.1. For a BES Facility where no entity owns the Facility in its entirety, all applicable entities that own the Facility shall coordinate development of a common Facility Rating using the documented methodology established under R2 and R3.

Likes 0

Dislikes 0

Response

Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3

Answer

No

Document Name

Comment

Adding “accurately identifying” does not make the R6 Requirement risk based. The term “accurately identifying” should be removed from R6 because the ambiguity of its definition does add compliance perplexity.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #1.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer

No

Document Name

Comment

In the SAR, it states that the term “jointly owned” is to be clarified. Given the use of this term in other standards, it should be defined in the context of FAC-008. It is not sufficient to add language within subparts of Requirement R6. To address this concern, Jointly Owned should be defined in FAC-008. Language contained in Requirement R6 could be used for this definition (see below):

Jointly Owned BES Facility: Any BES Facility, subject to FAC-008, that is not owned in its entirety by a single responsible entity.

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 6

Answer No

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer No

Document Name

Comment

The NAGF supports the SDT’s intent to clarify the meaning of ‘jointly owned’ as well as the risk posed to the Bulk Electric System (BES) when there is a discrepancy found in the most Limiting Element of a Facility Rating. However, the NAGF recommends that the meaning of ‘jointly owned’ be further clarified/defined in the standard or in the NERC Glossary of Terms and not just limited to an explanation in the Technical Rationale supporting document.

As proposed in the Technical Rationale for Requirement R6 the SDT proposes two scenarios of ‘jointly owned’:

Scenario 1: Split ownership- Entities have shared ownership of a Facility where ownership of specific Elements that make up the Facility are solely owned by one entity and ownership changes over a line of demarcation.

Scenario 2: Joint ownership- Entities share ownership of individual Element(s)

For Scenario 1, this interpretation of the definition of joint ownership may have a significant impact on generating units that currently have a R2 rating from the high side of the main power transformer to the point of interconnection with the transmission entity (if a different entity from the GO), under the new ‘split ownership’ definition, the boundary or end point for the GO R2 Facility Rating may have to be re-evaluated which would require working with

the associated Transmission Owner (TO) to validate or develop a new R2. The GO may also be required to adopt a new methodology for Facility Ratings which will now be subject to audit beyond the contractual ownership and Point of Interconnection (POI).

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

No

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) supports the modification of Requirement R6 proposed by the SDT in clarifying the level of information data sharing between entities and in addressing inconsistencies observed by the ERO. CEHE does not believe the modification of R6 adequately addresses the meaning of jointly owned and therefore supports the Edison Electric Institute's (EEI) response to Question 1 that proposes Jointly Owned be defined in FAC-008-6 as follows:

Jointly Owned BES Facility: Any BES Facility, subject to FAC-008, that is not owned in its entirety by a single responsible entity.

Likes 0

Dislikes 0

Response

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer

No

Document Name

Comment

ITC supports the changes recommended by EEI including their proposed addition to the first bullet in R6.1. This language while supporting existing processes for some entities today, helps position FAC-008 for the transition to Ambient Adjusted Ratings required by FERC.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

No

Document Name

Comment

In the SAR, it states that the term “jointly owned” is to be clarified. Given the use of this term in other standards, it should be defined in the context of FAC-008. It is not sufficient to add language within subparts of Requirement R6. To address this concern, Jointly Owned should be defined in FAC-008. Language contained in Requirement R6 could be used for this definition (see below):

Jointly Owned BES Facility: Any BES Facility, subject to FAC-008, that is not owned in its entirety by a single responsible entity.

Likes 0

Dislikes 0

Response**Romel Aquino - Edison International - Southern California Edison Company - 3**

Answer

No

Document Name

Comment

See comments submitted by the Edison Electric Institute.

In the SAR, it states that the term “jointly owned” is to be clarified. Given the use of this term in other standards, it should be defined in the context of FAC-008. It is not sufficient to add language within subparts of Requirement R6. To address this concern, Jointly Owned should be defined in FAC-008. Language contained in Requirement R6 could be used for this definition (see below):

Jointly Owned BES Facility: Any BES Facility, subject to FAC-008, that is not owned in its entirety by a single responsible entity.

Likes 0

Dislikes 0

Response**Matt Lewis - Lower Colorado River Authority - 1**

Answer

No

Document Name

Comment

LCRA TSC believes the following existing principles of FAC-008 are:

- Each equipment owner must develop and maintain Equipment Ratings for the equipment they solely or jointly own consistent with their Facility Rating methodology, to determine the overall Facility Rating to respect the most-limiting Equipment Rating of equipment comprising the Facility.
- Each equipment owner must provide the Equipment Ratings, Facility Ratings, and identity of the most limiting equipment of the Facilities to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s).

The proposed Requirement R6 modification, including the addition of Part 6.1, introduce more problems than it solves. Specifically, the proposed revisions complicate the standard by:

- The proposed revisions are mute on clarifying “jointly owned” in R1, R2, and R3, which are foundational requirements for R6.
- The proposed revisions are mute on clarifying “jointly owned” in R8.
- An important NERC Rules of Procedure concept is that no registered entity may delegate its obligations to the Reliability Standards without a Joint Registration Organizations (JRO) or Coordinated Functional Registration (CFR) agreement. The requirement to “designate one owner to solely develop the most limiting Equipment Rating(s) for the Element(s)” appears to inappropriately delegate a Transmission Owner obligation to establish its Equipment Ratings.

FAC-008-5 Requirement 2 and 3 already requires a Entities to have a Facility Ratings methodology/documented process that specifies that Facility Ratings shall respect the most-limiting applicable Equipment Rating of the individual equipment that comprise the Facility. This includes jointly-owned facilities. The attempt to define coordination of Facility Ratings for “jointly owned” Facilities should be addressed earlier in the standard.

In the ERCOT ISO, entities are required to provide their Normal Rating, Emergency Rating, 15-Minute Rating, Conductor/Transformer 2-Hour Rating, and Relay Loadability Rating to ERCOT for use in the operations model. The operations model accepts ratings from more than one entity when there is an ownership share of equipment/facilities. In the instance ownership is shared for equipment/facilities, each entity enters their rating of the equipment, and the most limiting rating is then identified and used by the TOPs. ERCOT entities can use this process and information to understand the ratings for the other owner of a jointly-owned facility. The proposed language in R6.1 places the burden of the current ERCOT process on the individual entities.

LCRA TSC recommends adding an additional option/bullet under R6.1 to allow for ERCOT ISO entities to use ERCOT’s operation model ownershare process to determine the most limiting Equipment Ratings for jointly-owned Facilities, as described in the paragraph above.

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer

No

Document Name

Comment

LCRA TSC believes the following existing principles of FAC-008 are:

- Each equipment owner must develop and maintain Equipment Ratings for the equipment they solely or jointly own consistent with their Facility Rating methodology, to determine the overall Facility Rating to respect the most-limiting Equipment Rating of equipment comprising the Facility.
- Each equipment owner must provide the Equipment Ratings, Facility Ratings, and identity of the most limiting equipment of the Facilities to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s).

The proposed Requirement R6 modification, including the addition of Part 6.1, introduce more problems than it solves. Specifically, the proposed revisions complicate the standard by:

- The proposed revisions are mute on clarifying “jointly owned” in R1, R2, and R3, which are foundational requirements for R6.
- The proposed revisions are mute on clarifying “jointly owned” in R8.

- An important NERC Rules of Procedure concept is that no registered entity may delegate its obligations to the Reliability Standards without a Joint Registration Organizations (JRO) or Coordinated Functional Registration (CFR) agreement. The requirement to “designate one owner to solely develop the most limiting Equipment Rating(s) for the Element(s)” appears to inappropriately delegate a Transmission Owner obligation to establish its Equipment Ratings.

FAC-008-5 Requirement 2 and 3 already requires a Entities to have a Facility Ratings methodology/documented process that specifies that Facility Ratings shall respect the most-limiting applicable Equipment Rating of the individual equipment that comprise the Facility. This includes jointly-owned facilities. The attempt to define coordination of Facility Ratings for “jointly owned” Facilities should be addressed earlier in the standard.

In the ERCOT ISO, entities are required to provide their Normal Rating, Emergency Rating, 15-Minute Rating, Conductor/Transformer 2-Hour Rating, and Relay Loadability Rating to ERCOT for use in the operations model. The operations model accepts ratings from more than one entity when there is an ownership share of equipment/facilities. In the instance ownership is shared for equipment/facilities, each entity enters their rating of the equipment, and the most limiting rating is then identified and used by the TOPs. ERCOT entities can use this process and information to understand the ratings for the other owner of a jointly-owned facility. The proposed language in R6.1 places the burden of the current ERCOT process on the individual entities.

LCRA TSC recommends adding an additional option/bullet under R6.1 to allow for ERCOT ISO entities to use ERCOT’s operation model ownershare process to determine the most limiting Equipment Ratings for jointly-owned Facilities, as described in the paragraph above.

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

No

Document Name

Comment

The revised requirement requires the TO/GO to “develop Facility Ratings” that accurately identify the rating of the most “Limiting Element” in accordance with their associated Facility Ratings methodology or documentation. The methodology and documentation requirements come from Requirements R1, R2, and R3. However, Requirements R1, R2, and R3 do not include the term “Limiting Element”, so this creates a disconnect in the requirements. We suggest not using the defined term “Limiting Element” in R6/M6 but rather use the terminology “most limiting applicable Equipment Rating” since that is what’s used in Requirements R1, R2, and R3.

In the first line of R6, we suggest that the word “have” be replaced with “develop and maintain” rather than just “develop”, since this is an ongoing exercise.

Part 6.1 uses the terminology “most limiting Equipment Rating”. However, Requirements R1, R2, and R3 use the terminology “most limiting applicable Equipment Rating”. We suggest revising Part 6.1 to be consistent with the earlier requirements.

We offer the following suggested wording for Part 6.1:

6.1. For a BES Facility where no entity owns the Facility in its entirety (i.e., jointly owned), all applicable entities that own a portion of the Facility shall coordinate development of a common Facility Rating using one or a combination of the following:

• Each entity shall provide the most limiting applicable Equipment Rating of their solely owned Elements to the other entities who share in the overall Facility ownership. Each entity will then adopt the most limiting applicable Equipment Rating(s) from all Element owner(s) as the Facility Rating for the jointly owned Facility.

• For Element(s) with multiple owners, the owners shall designate one owner to solely develop the most limiting Equipment Rating(s) for the Element(s).

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer

No

Document Name

Comment

The modification to Requirement R6 has not clarified the meaning of "jointly owned" and may still result in differing interpretations by auditors, Transmission Owners, and Generator Owners. The Standard would benefit from a proper definition that clarifies how facility boundaries are to be demarcated.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer

No

Document Name

Comment

From 6.1, please remove "and the most limiting Equipment Rating(s) from the other element owner(s)." Our FAC rating documentation is based on our equipment that we own as part of the facility. The other utility bases their rating on their associated elements. Transmission planning and System Operations takes these two ratings to come up with the operating limit for that facility. We do coordinate in the planning stage, but not with the FAC rating. This will be very difficult and not cost effective (see Question 3). It will be very much so burdensome with the oncoming AAR ratings.

This is not clear in cases where we tie into another owner's system and NEER would own all the equipment up to the point of delineation. In this instance, my understanding is I now need to keep an accurate account of the other party's equipment ratings? The language seems to be ambiguous

The revised language does not address how to handle BES Facility interconnections, nor does the definition of Facility support unique (non-typical) BES Facilities such as HVDC Transmission lines and other associated interconnectors where multiple pieces of electrical equipment act as a BES Facility. The revised language does not clarify the meaning of jointly owned, it only provides a method of procedure with regards to split ownership. It does not clarify any requirements for interconnected facilities where an Entity owns the facility in its entirety and provides a point of interconnection to a neighboring entity nor does the technical rationale describe the management of such scenario. The definitions and language used does not put any objective constraints on the limits of common Facility Ratings.

Nextera generally supports comments submitted by EEI

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis

Answer No

Document Name

Comment

The question proposed is a compound one. While proposed language does clarify the meaning of jointly owned by the inclusion of BES as well as additional qualifiers which distinguish from a Facility owned outright by a single entity, however the addition of “accurately identifying the rating of the Most Limiting element” brings in ambiguity in the application of the term “accurately”, as opposed to identifying. Please consider either explicitly defining within the requirement language, or removing “accurately” from the requirement and instead defining within the measures, the expectations around the identification process, looking to remove ambiguity in the determination as to what it means to “accurately” identify lest the owners be measured against subjective interpretation across future audit teams.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer No

Document Name

Comment

We agree that the proposed modification to Requirement R6 has clarified the meaning of “jointly owned”. We do not agree that the proposed modification to Requirement R6 clarifies that it is a risk-based requirement. Our main concern with the proposed language is the inclusion of the phrase “accurately identifying the rating of the most Limiting Element(s)...”. Who determines if the most Limiting Element(s) is “accurately identified” and what is the metric for determining such? We recommend removing phrase “accurately”.

Likes 0

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer No

Document Name

Comment

See the justification below for eliminating the GO from this standard in the response to Question #5. If the GO function is not removed from the standard, Southern Company endorses comments submitted by NAGF for jointly-owned comments.

Southern Company recommends the following revisions to R6 wording:

Each Transmission Owner and Generator Owner shall have Facility Ratings, which identify the rating of the most Limiting Element(s), for its solely and jointly owned Facilities that are consistent with its associated Facility Ratings methodology or documentation for determining its Facility Ratings.

Corresponding changes could be made in the Technical Rationale document that further clarify R6 only applies to MLE discrepancies.

Likes	0
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Dislikes	0
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Response**Daniel Gacek - Exelon - 1**

Answer	No
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Document Name	
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Comment

Exelon supports the comments submitted by the EEI on behalf of its members.

Likes	0
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Dislikes	0
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Response**Kinte Whitehead - Exelon - 3**

Answer	No
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Document Name	
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Comment

Exelon supports the comments submitted by the EEI on behalf of its members.

Likes	0
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Dislikes	0
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Response**Marty Hostler - Northern California Power Agency - 4**

Answer	No
Document Name	
Comment	
Their is no clarification provided.	
Likes 0	
Dislikes 0	
Response	
Jeremy Lawson - Northern California Power Agency - 5	
Answer	No
Document Name	
Comment	
Please see comments by Marty Hostler.	
Marty Hostler, P.E. NCPA Reliability Compliance Manager 651 Commerce Drive Roseville, California 95678 Office: 916-781-4230 Cell: 916-953-8574 Fax: 916-783-7693 Marty.hostler@ncpa.com	
Likes 0	
Dislikes 0	
Response	
Michiko Sell - Pine Gate Renewables - 5	
Answer	No
Document Name	

Comment

: The term “jointly owned” drafted in Requirement R6 and its sub-requirements is more prescriptive than it previously was and therefore, an improvement. It could be further clarified by adding more details around coordination, communication, and timelines (i.e., who does what, when). The standard should provide some general parameters, more than what is written in Draft 1, for consistency.

The revision of Requirement R6 in an effort to make it risk-based is problematic in that the proposed change in verbiage is confusing and unclear. Specifically, ...”solely and jointly owned BES Facilities *accurately identifying* the rating of the most Limiting Element(s)...” Any standard and requirement resulting in a calculation and/or numerical value should be accurate. “Accurately identifying” has also been added to the Requirement R6 measures. This terminology could create confusion among Registered Entities and Regional Entities (auditors) and negatively impact compliance status. Neither the language of Requirement R6 nor its sub-requirements clarify it as a risk-based requirement. It is ambiguous, leaning toward zero tolerance, as the current standard is written using the word “consistent.”

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer

Yes

Document Name

Comment

No Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

BPA agrees the proposed changes clarifies both points.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees the modifications to Requirement R6 clarify the meaning of “jointly owned” and makes it a risk-based Requirement.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Quebec (HQ) - 1

Answer Yes

Document Name

Comment

A clarification of the R6 VSL seems necessary since R6.1 is only for co-ownership installations.

Likes 0

Dislikes 0

Response

Wendy Kalidass - U.S. Bureau of Reclamation - 5

Answer Yes

Document Name

Comment

Reclamation concurs with the clarified meaning of “jointly owned”.

Likes 0

Dislikes 0

Response

Junji Yamaguchi - Hydro-Quebec (HQ) - 5

Answer Yes

Document Name	
Comment	
A clarification of the R6 VSL seems necessary since R6.1 is only for co-ownership installations.	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
SMUD agrees with the modifications to Requirement R6 as they help make it clear that the focus of the Requirement is on identifying the rating of the most Limiting Element, and help avoid confusion with respect to "jointly owned Facilities."	
Likes 0	
Dislikes 0	
Response	
David Jendras Sr - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments for this question.	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes

Document Name	
Comment	
Tri-State agrees with the modification of R6 however, we would like to see the term "jointly owned" become a defined term.	
Likes 0	
Dislikes 0	
Response	
Bryan Bennett - Sempra - San Diego Gas and Electric - 3	
Answer	Yes
Document Name	
Comment	
The new "Jointly Owned" definition makes sense, just needs to be in a different spot.	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
A clarification of the R6 VSL seems necessary since R6.1 is only for co-ownership installations.	
Likes 0	
Dislikes 0	
Response	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	

OPG supports the NPCC RSC's comments.

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph McClung - JEA - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Shannon Mickens On Behalf of: Matthew Harward, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Adrian Raducea - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE recommends removing “BES” in front of Facilities. In addition to being consistent with Requirement R1, Facility Ratings must consider Facility(ies) up to the low side terminals of the main step-up transformer which could include non-BES element(s). Texas proposes the following revision:

R6. “Each Transmission Owner and Generator Owner shall develop Facility Ratings for its solely and jointly owned Facilities accurately identifying the rating of the most Limiting Element(s) in accordance with its associated Facility Ratings Methodology or documentation for determining its Facility Ratings.”

Texas RE recommends clarifying Requirement Part 6.1 to specify owners of equipment within the Facility, rather than owing the Facility itself. Texas RE proposes the following language:

R6.1 “For a BES Facility where no entity owns the Facility in its entirety, all applicable entities that own equipment within the Facility.....”

Additionally, for Element(s) with multiple owners, the registered entity that is coordinating the Facility Rating based on the most Limiting Element may be an ISO or RC and not necessarily the facility owners. In addition, joint ownership could be demarked by ownership-line or jointly owned elements for which the multiple owners have its own Facility Rating Methodology for determining and establishing Facility Ratings. The overall Facility Rating should be limited by the conservative value used by the joint owner. The joint owners or designee should establish a mutually agreed upon process to finalize the jointly owned Facility Rating. The entities can use the mutual agreement document as the evidence. Texas RE proposes the following verbiage for the second bullet of 6.1:

“For Element(s) with multiple owners, the owners or a designee shall develop a mutually agreed upon process to finalize the most limiting Equipment Rating(s) for the Element(s).”

Texas RE noticed that the word “rating” is not capitalized in Requirement R6. Since it is a NERC Glossary defined term, Texas RE recommends it be capitalized. Furthermore, the SDT could consider updating the definitions of Element, Equipment Rating, Rating, and Limiting element to more align with the issues the FAC-008 revisions are working to resolve. For example, “Rating” as currently defined is limited to “The operational limits of a transmission system element under a specified set of conditions.” The definition does not mention generators.

Texas RE recommends the VSL language for Requirement R6 be revised to clarify that the percentage includes both solely and jointly owned Facilities.

Likes	0
Dislikes	0
Response	

2. Do you agree that the new Requirement R9 has clarified the meaning of “consistent” in relation to defining the processes?

Michiko Sell - Pine Gate Renewables - 5

Answer No

Document Name

Comment

Requirement R9 does not address or clarify the term “consistent” in relation to defining the processes. According to Merriam-Webster (online version), one definition of “consistent” is “tending to be arbitrarily close to the true value of the parameter estimated as the same becomes large | a *consistent* statistical estimator.” If this was the direction the SDT was trying to go, the SDT was unsuccessful, as no correlation can be made.

The addition of Requirement R9 adds little to no reliability benefit. Building a process to self-correct Element or Equipment Rating errors and determining if and when (R9.1 and R9.2) an extent of condition review is necessary is not an efficient use of limited resources that would be better used making process improvements and developing internal controls (specifically, detective controls.) If the intent is to lighten the burden in reporting Equipment Rating errors, the SDT should consider alternate paths.

Likes 0

Dislikes 0

Response

Jeremy Lawson - Northern California Power Agency - 5

Answer No

Document Name

Comment

Please see comments by Marty Hostler.

Marty Hostler, P.E.

NCPA Reliability Compliance Manager

651 Commerce Drive

Roseville, California 95678

Office: 916-781-4230

Cell: 916-953-8574

Fax: 916-783-7693

Marty.hostler@ncpa.com

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 4

Answer No

Document Name

Comment

No, and it is not needed the process in R6 is adequate.

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer No

Document Name

Comment

R9 requires a documented process in addition to the methodology. This additional process and documented evidence of changes is administrative, and it could be ambiguous how the timing aspect is captured in a spreadsheet or database format. Demonstrating compliance with this is not clear and will be an unnecessary burden that does not provide a benefit to reliability.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer No

Document Name

Comment

Exelon supports the comments submitted by the EEI on behalf of its members.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

No

Document Name

Comment

Exelon supports the comments submitted by the EEI on behalf of its members.

Likes 0

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer

No

Document Name

Comment

R9 adds administrative burden without providing clarity and with no clear connection to improving reliability. R9 brings into scope every piece of equipment which actually detracts from the original risk-based intentions and aspects of the standard. Southern Company believes this requirement should be removed.

If R9 is not removed, R9 should clearly specify that it only applies to non-MLE.

Additionally, in regulation protecting nuclear safety (10CFR50), discrepancies that do not change the final outcome of analyses are not deemed violations. Why should NERC standards consider these types of errors (non-MLEs) as violations for BES reliability when other regulators would not consider similar errors a violation?

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

No

Document Name

Comment

We do not believe the proposed language in Requirement R9 addresses consistency. Furthermore, we believe that the proposed language in Requirement R9 adds an unnecessary compliance burden on the responsible entity by requiring them to develop and maintain a documented process for correcting discrepancies on low-risk equipment that does not pose an impact to the BES. It is our opinion that, as written, this requirement seems to be more akin to an internal control than a Reliability Standard Requirement. For example, how will an entity be able to identify its most Limiting Element(s) if the other equipment ratings at the same facility are inaccurate? It is our opinion that this additional requirement is unnecessary, and we recommend removing Requirement R9.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer

No

Document Name

Comment

In the actual FAC requirements, it needs to be made clear that the correction process is only if there are other errors not associated with the actual FAC rating, the limiting element. If there is an issue with the limiting element, you must go through the correction process immediately and self-report. This is in clear in Rationale documentation, but not in the actual FAC-008.

It is not clear to me if I now need to report a MLE discrepancy under both R6 and under R9? Also, it's not clear to me if the intent of R9 is specific to MLE or non-MLE discrepancies, or both?

Nextera generally supports comments submitted by EEI

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer

No

Document Name

Comment

As currently drafted, Requirement R9 is redundant as Requirement R6 already requires entities to have a methodology or process for *accurately* determining its ratings. As an alternative, the drafting team could consider adding a periodic review to the methodology criteria under R2 and R3.

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer No

Document Name

Comment

The proposed new requirement does not clarify or even mention the word “consistent”. The earlier requirements require the entities to have Facility Ratings for their equipment so having a “process to correct” them is inherent in that – that is, if an applicable piece of equipment changes such that its “rating” changes and the Equipment or Facility Rating documentation isn’t changed, this would be a non-compliance. As such, the new requirement is not necessary and only adds to the work to maintain the “paperwork” to show compliance.

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer No

Document Name

Comment

Requirement R9 does not contain the word “consistent”.

LCRA TSC would like additional clarification for the R9 requirement to include “developing timelines” in the process to correct a Facility rating discrepancy. Timelines can vary based on the individual discrepancy and how widespread the extent of condition review needs to be. An example or additional language in the Technical Rationale would be helpful.

Likes 0

Dislikes 0

Response

Matt Lewis - Lower Colorado River Authority - 1

Answer No

Document Name

Comment

Requirement R9 does not contain the word “consistent”.

LCRA TSC would like additional clarification for the R9 requirement to include “developing timelines” in the process to correct a Facility rating discrepancy. Timelines can vary based on the individual discrepancy and how widespread the extent of condition review needs to be. An example or additional language in the Technical Rationale would be helpful.

Likes 0

Dislikes 0

Response

Romel Aquino - Edison International - Southern California Edison Company - 3

Answer

No

Document Name

Comment

See comments submitted by the Edison Electric Institute.

EEl does not support the addition of Requirement R9 because it adds new administrative requirements that provide no additional reliability benefit, is not risk based, and could be understood to be redundant to existing language already contained in Requirements R1, R2 and R3. EEl also notes that the SAR scope includes scope language that was intended to remove unnecessary administrative burdens, not add new ones within other requirements. Moreover, the language in Requirement R9 attempts to solve regional consistency issues that would be better served through the use of the ERO’s Enterprise Program Alignment Process.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

No

Document Name

Comment

EEl does not support the addition of Requirement R9 because it adds new administrative requirements that provide no additional reliability benefit, is not risk based, and could be understood to be redundant to existing language already contained in Requirements R1, R2 and R3. EEl also notes that the SAR scope includes scope language that was intended to remove unnecessary administrative burdens, not add new ones within other requirements. Moreover, the language in Requirement R9 attempts to solve regional consistency issues that would be better served through the use of the ERO’s Enterprise Program Alignment Process.

Likes 0

Dislikes 0

Response

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer No

Document Name

Comment

ITC supports the changes recommended by EEI.

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

CEHE supports the comments as submitted by EEI.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer No

Document Name

Comment

The NAGF believes that the proposed Requirement R9 is an administrative requirement and recommends that it be deleted accordingly.

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 6**Answer** No**Document Name****Comment**

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response**Selene Willis - Edison International - Southern California Edison Company - 5****Answer** No**Document Name****Comment**

EEI does not support the addition of Requirement R9 because it adds new administrative requirements that provide no additional reliability benefit, is not risk based, and could be understood to be redundant to existing language already contained in Requirements R1, R2 and R3. EEI also notes that the SAR scope includes scope language that was intended to remove unnecessary administrative burdens, not add new ones within other requirements. Moreover, the language in Requirement R9 attempts to solve regional consistency issues that would be better served through the use of the ERO's Enterprise Program Alignment Process.

Likes 0

Dislikes 0

Response**Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster****Answer** No**Document Name****Comment**

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #2.

Likes 0

Dislikes 0

Response

Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3

Answer No

Document Name

Comment

R9 has not clarified the meaning of “consistent” in relation to defining the process. R9 should be changed to a performance-based requirement applicable when a discrepancy is identified. Also, the term discrepancy is too broad and should be defined to bring clarity to the Requirement.

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer No

Document Name

Comment

SIGE does not support the addition of Requirement R9 and recommends removing the proposed R9.

From a procedural standpoint, the SAR did not direct the inclusion of a requirement to address discrepancies. And from a reliability standpoint, SIGE does not believe the inclusion of R9 provides additional reliability benefit.

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer No

Document Name

Comment

There is potentially some “additional reliability benefit” of the proposed R9. We suspect it could increase utilities’ accountability for the correction process/timeline, but we do sympathize that it could be an unnecessary administrative burden. If entities are fulfilling the current FAC-008 requirement of having ratings that are consistent with their methodology, then they would have a solid internal correction process.

Likes 0

Dislikes 0

Response

Colin Chilcoat - Invenergy LLC - 6

Answer No

Document Name

Comment

As currently drafted, Requirement R9 is redundant as Requirement R6 already requires entities to have a methodology or process for *accurately* determining its ratings. As an alternative, the drafting team could consider adding a periodic review to the methodology criteria under R2 and R3.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer No

Document Name

Comment

Minnesota Power supports MRO's NERC Standards Review Forum's (NSRF) comments.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer No

Document Name

Comment

NV Energy does not agree with Requirement R9 and recommends its removal. Requiring an entity to have a 'documented process' to correct inaccurate equipment Ratings is unnecessary, burdensome, administrative and provides no reliability value. Inherently, Requirement R6 requires a responsible entity to accurately Rate its equipment to develop a Facility Rating(s). If equipment Ratings are inaccurate, then the responsible entity has not effectively applied Requirement R1, R2 and/or R3.

It appears that the SAR scope and technical rationale are attempting to provide an exemption to the zero-tolerance aspect FAC-008 regarding Equipment Ratings or data errors that do not affect the overall Facility Rating or do not produce a risk to the BES.

From the technical rationale: This allows entities the freedom to make necessary corrections to Equipment Ratings that do not affect the most Limiting Element within their own process without the administrative overhead of self-reporting.

Requirement 9 as written does not clarify “consistent” in anyway. R9 also does not reflect the intent of the SAR or technical rationale. R9 does not call out Equipment Ratings that do not affect the most limiting element or data errors. R9 does not mention that self-reporting is not necessary.

Another aspect of R9. It’s intended purpose per the technical rationale is to reduce PNCs for Equipment Ratings or data errors that do not affect the overall Facility Rating; however, a PNC can occur if you do not have a process for reducing Equipment Ratings or data errors that do not affect the overall Facility Rating. This may lead to a double jeopardy situation where an entity is in violation of an incorrect Equipment Rating for a low-risk element and a process for not correcting an incorrect Equipment Rating or data error for Equipment that do not affect the overall Facility Rating or do not produce a risk to the BES.

R9 is an internal control that an entity may already have as part of their Facility Ratings program. The SDT needs to reconsider R9 with respect to the SAR, technical rationale, and the intended purpose of reducing the administrative and punitive burden of Equipment Ratings or data errors that do not affect the overall Facility Rating or do not produce a risk to the BES.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

No

Document Name

Comment

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Joseph McClung - JEA - 1

Answer

No

Document Name

Comment

There is no reliability benefit associated with this change. Also, clarity is needed in R9 as to whether it is specific to most limiting elements.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer No

Document Name

Comment

Ameren does not agree with the new Requirement R9 and supports removing it.

Likes 0

Dislikes 0

Response

Ryan Strom - Ryan Strom On Behalf of: Carl Spaetzel, Buckeye Power, Inc., 4, 3, 5; Jason Procuniar, Buckeye Power, Inc., 4, 3, 5; Kevin Zemanek, Buckeye Power, Inc., 4, 3, 5; - Ryan Strom, Group Name Buckeye Power Group

Answer No

Document Name

Comment

Buckeye supports the comments made by ACES:

We do not believe the proposed language in Requirement R9 addresses consistency. Furthermore, we believe that the proposed language in Requirement R9 adds an unnecessary compliance burden on the responsible entity by requiring them to develop and maintain a documented process for correcting discrepancies on low-risk equipment that does not pose an impact to the BES. It is our opinion that, as written, this requirement seems to be more akin to an internal control than a Reliability Standard Requirement. For example, how will an entity be able to identify its most Limiting Element(s) if the other equipment ratings at the same facility are inaccurate? It is our opinion that this additional requirement is unnecessary, and we recommend removing Requirement R9.

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer No

Document Name

Comment

AEPC signed on to ACES comments:

We do not believe the proposed language in Requirement R9 addresses consistency. Furthermore, we believe that the proposed language in Requirement R9 adds an unnecessary compliance burden on the responsible entity by requiring them to develop and maintain a documented process for correcting discrepancies on low-risk equipment that does not pose an impact to the BES. It is our opinion that, as written, this requirement seems to be more akin to an internal control than a Reliability Standard Requirement. For example, how will an entity be able to identify its most Limiting Element(s) if the other equipment ratings at the same facility are inaccurate? It is our opinion that this additional requirement is unnecessary, and we recommend removing Requirement R9.

Likes 0

Dislikes 0

Response

Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1

Answer

No

Document Name

Comment

Con Edison does not agree that the proposed new Requirement R9 has clarified the meaning of “consistent” relative to processes for correcting rating discrepancies found in either Element or Equipment Rating(s). Con Edison recommends that R9 be re-drafted as follows:

R9. Each Transmission Owner and Generator Owner shall have a process to correct rating discrepancies found in either Element or Equipment Rating(s) used to develop Facility Ratings, that do not impact overall Facility Ratings. The process shall also require the development of a timeline for and correction of the discrepancy. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]

Likes 0

Dislikes 0

Response

Gary Trezza - Long Island Power Authority - 1 - NPCC

Answer

No

Document Name

Comment

It is not clear how R9 clarified the meaning of "consistent" in relation to defining the processes when R9 is addressing a new internal control.

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer No

Document Name

Comment

Dominion Energy supports EEi comments in general, but we are also of the opinion that R9 is both outside of the scope of the SAR and is vague and open to excessive interpretation. A rating discrepancy is undefined and can be defined very differently throughout industry. Also, by using when necessary in the Requirement, the Requirement is now open to subjective determination by the ERO. Finally, use of "Elements or Equipment Ratings" creates confusion as differentiating between the two is subjective.

Likes 0

Dislikes 0

Response

Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies

Answer No

Document Name

Comment

RF believes the combination of the proposed R6 revision and new R9 will be an improvement over the use of "consistent with" in FAC-008-5 R6. However, as currently proposed, Requirement R9 and Measure M9 do not explicitly require utilization of the process. RF recommends revising the requirement to specify "establish and utilize a process to correct..." (patterned after PRC-027). RF also recommends including "dated electronic or hard copy documentation to demonstrate that the responsible entity utilized its process to correct any identified Element or Equipment Rating discrepancies" in the measure.

Additionally, while the addition of R9 should help to ensure extensive Equipment Rating discrepancies found during CMEP activities are mitigated, the requirement does not explicitly require applicable entities to proactively look for issues. Other standards, such as PRC-027 R2 and other standards have 20% per year requirements for periodic review, and 10% per year for some PRC-005 activities of periodic reviews which serve as detective controls. The R9 requirement should not only require corrective controls, but also include detective controls.

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer No

Document Name

Comment

The addition of Requirement R9 adds new administrative requirements and will create audit challenges for FAC-008. We agree with EEI's comments on this question.

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

No

Document Name

Comment

The R9 rationale and R9 requirement wording do not appear to align. R9 discusses having a process to correct discrepancy errors but the rationale further indicates that if the error does not impact the MLE rating, then self-reporting would not be required. As this is not clear in the R9 wording, recommend including it (and not leaving in the rationale). Furthermore, is R9 necessary? This appears to be merely an administrative requirement with no real reliability value.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

No

Document Name

Comment

The R9 rationale and R9 requirement wording do not appear to align. R9 discusses having a process to correct discrepancy errors but the rationale further indicates that if the error does not impact the MLE rating, then self-reporting would not be required. As this is not clear in the R9 wording, recommend including it (and not leaving in the rationale). Furthermore, is R9 necessary? This appears to be merely an administrative requirement with no real reliability value.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response	
Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay	
Answer	No
Document Name	
Comment	
AESCE supports the intent behind R9. The idea that an entity should correct any rating discrepancies that do not affect the most limiting Element(s) is great. But the way in which the requirement is written (shall have a process) makes it administrative in nature and does not add real reliability value.	
Likes 0	
Dislikes 0	
Response	
David Rivera - New York Power Authority - 3	
Answer	No
Document Name	
Comment	
NYPA appreciates the intent of the standard, however we are concerned that the SAR goals were able to meet as the proposed revision still keeps the administrative burden. NYPA also recommends that there should be a clarification explicitly stating that non-MLE (Most limiting Element) discrepancies do not require reporting. Also, there is no timeline mentioned with respect to R9. The current wording leaves too much room for interpretation, which could lead to varying assessments by auditors.	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Mathew Weber, Salt River Project, 3, 1, 6, 5; Sarah Blankenship, Salt River Project, 3, 1, 6, 5; Thomas Johnson, Salt River Project, 3, 1, 6, 5; Timothy Singh, Salt River Project, 3, 1, 6, 5; - Israel Perez	
Answer	No
Document Name	
Comment	
Not entirely. SRP's thought is that "extent of condition review" isn't a tremendously familiar phrase for many in the industry.	
Likes 0	

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1

Answer No

Document Name

Comment

- Violation Severity Level table: For the new R9, please use “section” or “part” to refer to the list containing R9.1, R9.2, R9.3 instead of “element” due to confusion with element ratings.
- R9: Must the timeline in the process document be fixed for all discoveries of a rating discrepancy, or can the timeline vary based on the action needed to correct a rating discrepancy? For example, the timeline for fixing a written error might be much shorter than the timeline for tracking down equipment information, which might be much shorter than the timeline to replace a piece of equipment, if that is required to correct the discrepancy.
- R9: Does NERC have suggested minimum or maximum timelines for correcting various types of rating discrepancies? No calendar timeline is specified within R9 or in the VSL table.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI comments.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI comments.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI comments.

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI comments.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer No

Document Name

Comment

Eversource is in support of EEI's comments.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer No

Document Name

Comment

The addition of R9 processes provides no clarification for the meaning of "consistent" as applied within the standard.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer No

Document Name

Comment

The addition of R9 processes provides no clarification for the meaning of "consistent" as applied within the standard.

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer No

Document Name

Comment

We support NSRF comments regarding this question. Clarifying that FAC-008 is risk-based should be done in R6 specifically allowing some tolerance to Facility Ratings errors rather than using the terms "consistent" and "accurate".

Likes 0

Dislikes 0

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power

Answer No

Document Name

Comment

Tacoma Power supports the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer No

Document Name

Comment

Requirement R9 has language about incorporating an "extent of condition review" into a process to correct discrepancies. There is no definition of "extent of condition review" making this potentially ambiguous. The "extent of condition review" should be clarified or perhaps be made a defined term.

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer No

Document Name

Comment

R6 requires development of ratings; and, while the word "accurately" raises concerns as noted above, it is implied that the work is done in a fundamentally correct manner. R9 assumes that an error was made, however, and must be corrected. This internal conflict in the standard should be addressed by removing R9, unless NERC is hinting at an obligation to challenge OEM ratings and not assume that nameplate values are correct. Such an outlook would be unwarranted, and again R9 should be removed.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer No

Document Name

Comment

While it is clear that data errors that impact a Facility Rating must be self-reported; FAC-008-6, as currently written, is not clear that data errors that do not impact a Facility Rating do not need to be self-reported. AZPS recommends that R9 should be revised to clearly address this issue.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

Requirement R9 mandates a written process for activities that are already being performed by applicable Owners to ensure continued compliance to the existing Standard. The proposed Requirement also lacks an adherence/enforcement element as written; simply having a documented internal control/process does not inherently improve performance and therefore the Requirement does not add value. However, policing adherence to internal controls (via an extension of R9 or addition of R10) would be an over-reach of authority. The proposed Requirement is designed to act as a control to promote compliance to the other Requirements, which is redundant. R9 should be removed.

Further, FirstEnergy supports EEI's comments which state:

EEI does not support the addition of Requirement R9 because it adds new administrative requirements that provide no additional reliability benefit, is not risk based, and could be understood to be redundant to existing language already contained in Requirements R1, R2 and R3. EEI also notes that the SAR scope includes scope language that was intended to remove unnecessary administrative burdens, not add new ones within other requirements. Moreover, the language in Requirement R9 attempts to solve regional consistency issues that would be better served through the use of the ERO's Enterprise Program Alignment Process.

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer No

Document Name

Comment

The MRO NSRF does not agree with Requirement R9 and recommends its removal. Requiring an entity to have a ‘documented process’ to correct inaccurate equipment Ratings is unnecessary, burdensome, administrative and provides no reliability value. Inherently, Requirement R6 requires a responsible entity to accurately Rate its equipment to develop a Facility Rating(s). If equipment Ratings are inaccurate, then the responsible entity has not effectively applied Requirement R1, R2 and/or R3.

It appears that the SAR scope and technical rationale are attempting to provide an exemption to the zero-tolerance aspect FAC-008 regarding Equipment Ratings or data errors that do not affect the overall Facility Rating or do not produce a risk to the BES.

From the technical rationale: This allows entities the freedom to make necessary corrections to Equipment Ratings that do not affect the most Limiting Element within their own process without the administrative overhead of self-reporting.

Requirement 9 as written does not clarify “consistent” in anyway. R9 also does not reflect the intent of the SAR or technical rationale. R9 does not call out Equipment Ratings that do not affect the most limiting element or data errors. R9 does not mention that self reporting is not necessary.

Another aspect of R9. It’s intended purpose per the technical rationale is to reduce PNCs for Equipment Ratings or data errors that do not affect the overall Facility Rating, however, a PNC can occur if you do not have a process for reducing Equipment Ratings or data errors that do not affect the overall Facility Rating. This may lead to a double jeopardy situation where an entity is in violation of an incorrect Equipment Rating for a low risk element and a process for not correcting an incorrect Equipment Rating or data error for Equipment that do not affect the overall Facility Rating or do not produce a risk to the BES.

R9 is an internal control that an entity may already have as part of their Facility Ratings program. The SDT needs to reconsider R9 with respect to the SAR, technical rationale and the intended purpose of reducing the administrative and punitive burden of Equipment Ratings or data errors that do not affect the overall Facility Rating or do not produce a risk to the BES.

Likes 2

Lincoln Electric System, 5, Millard Brittany; American Municipal Power, 5, Ritts Amy

Dislikes 0

Response

Robert Follini - Avista - Avista Corporation - 3

Answer No

Document Name	
Comment	
Avista does not support the addition of Requirement R9 because it adds new administrative requirements and will create audit challenges for FAC-008. Avista also agrees with EEI's comments on this question.	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	No
Document Name	
Comment	
Avista does not support the addition of Requirement R9 because it adds new administrative requirements and will create audit challenges for FAC-008. Avista also agrees with EEI's comments on this question.	
Likes 0	
Dislikes 0	
Response	
Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF	
Answer	No
Document Name	
Comment	
<p>-This question is confusing since R9 does not address "consistent"; R6 originally addressed this term but was struck from the revised Standard.</p> <p>-Include the following language in R6 or R9 to clarify the meaning of consistent: "A discrepancy that does not affect the MLE is not a noncompliance or violation." (Paraphrased - Source: Project 2021-08 Modifications to FAC-008 Industry Webinar, October 2, 2023, Slide Presentation, Slide 14).</p> <p>-Duke Energy does not agree R9 is necessary.</p> <p>-Replace the word element from the following R9 VSL Table entries: The entity failed to include one of the "sub-requirements" required by Parts 9.1, 9.2, and 9.3.</p>	
Likes 0	
Dislikes 0	

Response

Brian Lindsey - Entergy - 1

Answer No

Document Name

Comment

R6 is redundant to parts of R1, R2, and R3. Ambiguousness needs to be removed from some or all of those requirements.

R1, R2, and R3 require documentation of Facility Ratings, a definition which includes elements in addition to the most limiting element. The proposed FAC-008 standard does not remove the burden of correctly documenting all elements in a Facility Rating. It may be argued that one may connect-the-dots through FAC-008 and the NERC Glossary of Terms to conclude that only the most limiting element needs to be correctly documented. However, the proposed FAC-008 revision does not make this clear, and it should make that clear if this is the primary motivation for the revision.

R9's requirement for a CAP seems random. R9 does not remove any documentation or self-reporting burden other than to create more audit overhead in cases where a utility has found and corrected errors. Entergy, and likely most if not all utilities, have some form of a corrective action program which they use with FAC-008, other NERC standards, and a litany of topics outside of NERC. I see no value in adding a CAP requirement to FAC-008 that justifies the compliance and audit burden.

If the object is to remove consequences of incorrectly recorded elements other than the most-limiting-element, the SDT should revise all Facility Rating requirements to refer only to the most limiting element. Measurements could be revised to require documentation supporting the most-limiting-element conclusions. This may support the goal of requirements to document the most limiting element without a hard requirement to have other elements documented.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer No

Document Name

Comment

R9 appears to be an administrative requirement to develop and have a process even if not needed. R6 appears to have been written to minimize zero tolerance auditing for equipment rating discrepancies for elements that are not the most limiting element by providing for the entity to correct the discrepancy. However, an error found on one of these elements at audit could result in a non-compliance with the new R9 because the entity did not use its process to find and correct the discrepancy.

Recommend changing R9 to be performance based similar to R5 of PRC-004 rather than a process/administrative requirement. Remove the need for a process and make the performance requirement something like "when a discrepancy is identified, correct the applicable rating, determine if the error applies to other equipment and correct any additional errors found." Could also consider or require some sort of time limit.

Likes 0

Dislikes 0

Response

Tammy Porter - Tammy Porter On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Tammy Porter

Answer No

Document Name

Comment

R9 does not clarify the meaning of “consistent.” R9 requires each entity to have a documented process for correcting any rating discrepancies.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer No

Document Name

Comment

The word discrepancy is far too vague and broad to be used as part of an obligation and would be subject to wide interpretation among entities. The standard drafting team needs to develop a definition for this term (for use within the standard), and as such, make it clear as to when a ratings discrepancy has or has-not occurred. The scope of discrepancy should not be unnecessarily broad, and rather, should be limited only to those occurrences where actual field conditions do not match the rating information as shown in an entity’s system of record.

While we believe there is some reliability benefit in R9, we once again contend that R9 as currently proposed is administratively burdensome, as well as excessive given the modest reliability benefits. If the SDT believes the non MLSE ratings are not applicable to R6, clarification should be provided to ensure they are explicitly omitted from the scope of this standard.

Likes 0

Dislikes 0

Response

Ben Hammer - Western Area Power Administration - 1

Answer No

Document Name

Comment

Why did the SDT choose to draft Requirement R9 when this was not directed by the NERC Project 2021-08 SAR? The obligation for a Transmission Owner to correct Equipment Ratings discrepancies that affect Facility Ratings is already at the heart of having a Facility Ratings methodology (Requirement R3) and establishing Facility Ratings (R6). It is confusing that the SDT would suggest another process, independent of what is already prescribed for the Facility Ratings methodology (Requirement R3), to make timely corrections when Transmission Owners must already consider this risk-based reality in their own FAC-008-5 programs. The new Requirement R9 is unnecessary and should be removed.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer No

Document Name

Comment

It is not clear if the discrepancy is an internal problem between documentation and the field, or if the discrepancy is between the entity and an interconnected entity on jointly or solely owned BES facilities.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

OPG supports the NPCC RSC's comments.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

While we agree with R9 requiring that the TO and GO have a process used to correct each rating discrepancy found in either Element or Equipment Ratings used to develop Facility Ratings, R9 does not require it application, nor does it indicate any deadlines in which the process needs to be implemented.

The language “extent of condition review” in R9 Part 9.2 and 9.3 is not defined anywhere and should be clarified or defined somewhere.

Likes 0

Dislikes 0

Response**Junji Yamaguchi - Hydro-Quebec (HQ) - 5**

Answer

Yes

Document Name

Comment

While we agree with R9 requiring that the TO and GO have a process used to correct each rating discrepancy found in either Element or Equipment Ratings used to develop Facility Ratings, R9 does not require it application, nor does it indicate any deadlines in which the process needs to be implemented.

The language “extent of condition review” in R9 Part 9.2 and 9.3 is not defined anywhere and should be clarified or defined somewhere.

Likes 0

Dislikes 0

Response**Wendy Kalidass - U.S. Bureau of Reclamation - 5**

Answer

Yes

Document Name

Comment

Reclamation agrees that the process of R9.1-R9.3 develops consistency with addressing corrections. However, Reclamation does not agree with the addition of R9 to the new revision. See additional comments below.

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Quebec (HQ) - 1

Answer Yes

Document Name

Comment

While we agree with R9 requiring that the TO and GO have a process used to correct each rating discrepancy found in either Element or Equipment Ratings used to develop Facility Ratings, R9 does not require it application, nor does it indicate any deadlines in which the process needs to be implemented.

The language “extent of condition review” in R9 Part 9.2 and 9.3 is not defined anywhere and should be clarified or defined somewhere.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer Yes

Document Name

Comment

PG&E agrees the removal of the word “consistent” and replacement with other language in R6 and is supported by the addition of R9 creates clarification.

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer Yes

Document Name

Comment

If this question intends to reference R6, then yes, the proposed language clarifies the requirement to implement and adhere to an entity’s documented methodology.

Likes 0

Dislikes 0

Response

Adrian Raducea - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Shannon Mickens On Behalf of: Matthew Harward, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nazra Gladu - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Al McMeekin - Facility Ratings Task Force - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE supports the addition of Requirement R9. Texas RE recommends two points of clarification: including verbiage for TOs and GOs to implement their processes to correct rating discrepancies and ensuring the requirement language is consistent with the technical rationale.

Texas RE understands the requirement to mean that TOs and GOs shall have a process to correct rating discrepancies and be required to implement said processes. It would be clearer and more consistent with other standards, such as the CIP standards, if the verbiage included specifically that the process shall be implemented.

Additionally, Texas RE noticed a possible discrepancy between the Technical Rationale and the language in Requirement R9. The Technical Rationale for Requirement 9 states that the addition of this requirement is to ensure registered entities correct discrepancies found in Equipment Ratings that do not affect the most Limiting Element. Requirement R9, however, does not specify that it is not intended for the most Limiting Element.

There is no NERC Glossary definition for Element Rating and the language seems to indicate that as written. Texas RE suggests the SDT consider moving "Equipment Rating(s) in front of "Element" in the "or" statement for clarity.

Texas RE proposes the following revision to Requirement R9:

Each Transmission Owner and Generator Owner shall develop, review, and implement a documented process to determine Equipment Rating or Element(s) discrepancies and correct each discrepancy found in either Equipment Rating(s) or Elements used to develop Facility Ratings outside of the most Limiting Element. The documented process must include timelines to:

9.1 Complete corrections

9.2 Determination if an extent of condition review is necessary

9.3 Perform extent of condition review when necessary

Texas RE inquires whether the SDT believes a potential noncompliance exists if the entity goes beyond the timeline developed in the process?

Likes 0

Dislikes 0

Response

3. Do you agree that the modifications made in FAC-008-6 are cost effective?

Ben Hammer - Western Area Power Administration - 1

Answer No

Document Name

Comment

Some changes suggested by the SDT are ambiguous, unwieldy, and redundant. Therefore, the added cost to implement additional controls to account for the proposed changes are not cost effective.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer No

Document Name

Comment

As stated in our previous response, we do not believe the proposed obligations would significantly advance or improve the reliability of the BES, and given that significant administrative resources would be required, AEP does not believe the proposed modifications would be cost effective.

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer No

Document Name

Comment

The proposed R9 does not provide much additional value as entities already complete this type of EOC analysis for Equipment Ratings, which may not be reportable per FAC-008-5 and the Facility Rating defined term. The proposed draft R6 is additional burden to entities to demonstrate mandatory compliance which bears additional cost to entities that may not provide a commensurate amount of value to consumers.

Likes 0

Dislikes 0

Response	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	No
Document Name	
Comment	
The administrative burden created by the addition of R9 will create high cost impacts to Avista.	
Likes	0
Dislikes	0
Response	
Robert Follini - Avista - Avista Corporation - 3	
Answer	No
Document Name	
Comment	
The administrative burden created by the addition of R9 will create high cost impacts to Avista.	
Likes	0
Dislikes	0
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	No
Document Name	
Comment	
The MRO NSRF believes that the addition of Requirement R9 adds no reliability benefit and therefore is not cost effective. R9 imposes an administrative burden, formalizing an informal process industry already performs through R2, R3 and R6. Existing requirements already require entities to consider all Elements. Industry already corrects discrepancies when found. R9.2 and R9.3 could drive unintended impacts by imposing constant system wide reviews with little additional reliability benefit. Enforcement mechanisms already exist to drive systemwide reviews when they are found to be systemic as evidenced by the recent published Avangrid 7.5 million remediation.	
Likes	2
Dislikes	0
Lincoln Electric System, 5, Millard Brittany; American Municipal Power, 5, Ritts Amy	

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer No

Document Name

Comment

WEC Energy Group supports the comments of the MRO NSRF.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer No

Document Name

Comment

FE cannot determine the cost effectiveness of FAC-008-6 until the intent of FAC-008-6 is clear.

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer No

Document Name

Comment

ATC supports the MRO NSRF comments regarding cost.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer No

Document Name

Comment

A cost justification or quantified improvement in reliability has never existed to validate the need for Facility Ratings applied to radial connected generation resources. For example, a generating unit that has successfully provided a specified output consistently for 1, 5, or 50 years must comply with Facility Rating methodologies, documentation, and evidence, disregarding demonstrated operating capability proven on a regular basis. For practical operation, the ability to meet generation output capacity expectations are assessed daily. There are other standards that require reporting of diminished or degraded output generating capacity such as MOD-025 capability testing performed on scheduled intervals. In fact, Balancing Authorities and Transmission Owners have never requested Generator Facility ratings information from NRG entities for any of their planning efforts. Repetitive application of FAC-008 obligations is unproductive and unnecessary; Facility Rating documents do not improve the reliability of Generator Owner's equipment, performance, or operation.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer No

Document Name

Comment

A cost justification or quantified improvement in reliability has never existed to validate the need for Facility Ratings applied to radial connected generation resources. For example, a generating unit that has successfully provided a specified output consistently for 1, 5, or 50 years must comply with Facility Rating methodologies, documentation, and evidence, disregarding demonstrated operating capability proven on a regular basis. For practical operation, the ability to meet generation output capacity expectations are assessed daily. There are other standards that require reporting of diminished or degraded output generating capacity such as MOD-025 capability testing performed on scheduled intervals. In fact, Balancing Authorities and Transmission Owners have never requested Generator Facility ratings information from NRG entities for any of their planning efforts. Repetitive application of FAC-008 obligations is unproductive and unnecessary; Facility Rating documents do not improve the reliability of Generator Owner's equipment, performance, or operation.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer No

Document Name

Comment

At the moment, it is difficult for AESCE to evaluate the cost effectiveness of the changes to FAC-008. Especially, without knowing the exact definition of "jointly owned."

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

No

Document Name

Comment

Depending on the final interpretation of "jointly owned" (Q1), this may not be cost effective as entities may have to alter/change their methodologies for determining most limiting elements to align with other entities (if GO and TO are not the same company).

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

No

Document Name

Comment

Depending on the final interpretation of "jointly owned" (Q1), this may not be cost effective as entities may have to alter/change their methodologies for determining most limiting elements to align with other entities (if GO and TO are not the same company).

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Mike Magruder - Avista - Avista Corporation - 1

Answer	No
Document Name	
Comment	
The administrative burden created by the addition of R9 will create high cost impacts.	
Likes 0	
Dislikes 0	
Response	
Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion	
Answer	No
Document Name	
Comment	
The modifications appear to create administrative requirements with little benefit to reliability or addressing any specific reliability gaps.	
Likes 0	
Dislikes 0	
Response	
Gary Trezza - Long Island Power Authority - 1 - NPCC	
Answer	No
Document Name	
Comment	
No. The implementation of R9 will demand more time and management to keep track of more documentation.	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	No
Document Name	

Comment

Minnesota Power supports MRO's NERC Standards Review Forum's (NSRF) comments.

Likes 0

Dislikes 0

Response**Colin Chilcoat - Invenergy LLC - 6**

Answer

No

Document Name

Comment

Given the redundant nature of new Requirement R9, Invenergy believes the modifications impose additional costs on entities with no additional reliability benefit.

Likes 0

Dislikes 0

Response**Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3**

Answer

No

Document Name

Comment

The modification in FAC-008-6 are not cost effective as proposed, adding more administrative burden than reliability benefit.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer

No

Document Name

Comment

Energy is not in favor of adding R9 which will add administrative burden and costs to maintain a separate process than the entity's existing Facility Ratings Methodology.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

No

Document Name

Comment

GOs will need more information to adequately address the cost-effectiveness of the proposed approach.

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

No

Document Name

Comment

CEHE does not believe the proposed obligations would significantly improve the reliability of the BES, and given that significant administrative resources would be required, CEHE does not believe the proposed modifications would be cost effective.

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

No

Document Name

Comment

We believe the proposed new Requirement R9 is just a paper exercise and adds no value.

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer

No

Document Name

Comment

Given the redundant nature of new Requirement R9, Invenergy believes the modifications impose additional costs on entities with no additional reliability benefit.

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer

No

Document Name

Comment

No, will be exorbitant if we must coordinate with other utilities on limiting elements in FAC documentation. See #1.

Does not take into consideration the impact of FERC 881 Ambient Adjusted Ratings requirements and the potential for data exchange between entities

Nextera generally supports comments submitted by EEI

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis

Answer

No

Document Name	
Comment	
Please see response to Question #5	
Likes 0	
Dislikes 0	
Response	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	No
Document Name	
Comment	
For the reasons listed above, the standard should not address non-MLE discrepancies and R9 should be removed. Southern Company does support clarifying R6 to ensure it is only applicable to MLE discrepancies.	
Likes 0	
Dislikes 0	
Response	
Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford	
Answer	No
Document Name	
Comment	
The cost impact of adding the administrative requirement R9 can't be determined at this time.	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 4	
Answer	No
Document Name	

Comment

No, this appears to be another administrative function with no value. Additionally, the drafting team has not provided a cost vs. benefit analysis.

Likes 0

Dislikes 0

Response**Jeremy Lawson - Northern California Power Agency - 5**

Answer

No

Document Name

Comment

Please see comments by Marty Hostler.

Marty Hostler, P.E.

NCPA Reliability Compliance Manager

651 Commerce Drive

Roseville, California 95678

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Cell: 916-953-8574

Fax: 916-783-7693

Marty.hostler@ncpa.com

Likes 0

Dislikes 0

Response**Michiko Sell - Pine Gate Renewables - 5**

Answer

No

Document Name

Comment

With the addition of Requirement R9, Registered Entities might find themselves frequently performing extent of condition reviews and field verification, which, as mentioned in question 2, is time and resource intensive and provides minimal reliability benefit. Consequently, ratings programs become more reactive as opposed to proactive, and budget dollars are allocated inefficiently. While FAC-008-5, as written today, does not explicitly address each of the activities defined in Requirement R9 and its sub-requirements, such activities should already be accounted for in Registered Entities' methodologies and processes under Requirements R1, R2, R3, and/or R6.

Likes 0

Dislikes 0

Response

Donald Lock - Talen Generation, LLC - 5

Answer

No

Document Name

Comment

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer

Yes

Document Name

Comment

No Comment

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer

Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Wendy Kalidass - U.S. Bureau of Reclamation - 5

Answer

Yes

Document Name

Comment

Reclamation agrees.

Likes 0

Dislikes 0

Response

Ryan Strom - Ryan Strom On Behalf of: Carl Spaetzel, Buckeye Power, Inc., 4, 3, 5; Jason Procuniar, Buckeye Power, Inc., 4, 3, 5; Kevin Zemanek, Buckeye Power, Inc., 4, 3, 5; - Ryan Strom, Group Name Buckeye Power Group

Answer

Yes

Document Name

Comment

Buckeye supports the comments made by ACES:

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer

Yes

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer Yes

Document Name

Comment

OPG supports the NPCC RSC's comments.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tammy Porter - Tammy Porter On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Tammy Porter

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jeffrey Streifling - NB Power Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Israel Perez - Israel Perez On Behalf of: Mathew Weber, Salt River Project, 3, 1, 6, 5; Sarah Blankenship, Salt River Project, 3, 1, 6, 5; Thomas Johnson, Salt River Project, 3, 1, 6, 5; Timothy Singh, Salt River Project, 3, 1, 6, 5; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

David Rivera - New York Power Authority - 3

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Quebec (HQ) - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

AI McMeekin - Facility Ratings Task Force - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Junji Yamaguchi - Hydro-Quebec (HQ) - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph McClung - JEA - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Shannon Mickens On Behalf of: Matthew Harward, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Matt Lewis - Lower Colorado River Authority - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Teresa Krabe - Lower Colorado River Authority - 5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Alain Mukama - Hydro One Networks, Inc. - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Adrian Raducea - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

Document Name

Comment

WECC has no comment on the cost effectiveness.

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

-Duke Energy's focus is to assure the effective and efficient reduction of risks to the reliability and security of the grid and will not provide comments on the cost effectiveness of the proposed changes.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Document Name

Comment

PG&E cannot determine the cost effectiveness of the modification until the final modifications have been approved.

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer

Document Name

Comment

Black Hills Corporation will not provide comment on cost effectiveness.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer

Document Name

Comment

Black Hills Corporation will not provide comment on cost effectiveness.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer

Document Name

Comment

Black Hills Corporation will not provide comment on cost effectiveness.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer

Document Name

Comment

Black Hills Corporation will not supply comments on cost effectiveness.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Document Name

Comment

Ameren has no comment on the cost effectiveness of this project.

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer

Document Name

Comment

No Comment

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 6

Answer

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Romel Aquino - Edison International - Southern California Edison Company - 3

Answer

Document Name

Comment

EI will not provide comments to the cost effectiveness question.

Likes 0

Dislikes 0

Response

4. Do you agree that the Implementation Plan for revised FAC-008-6 is appropriate?

Jeremy Lawson - Northern California Power Agency - 5

Answer No

Document Name

Comment

Please see comments by Marty Hostler.

Marty Hostler, P.E.

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Marty.hostler@ncpa.com

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 4

Answer No

Document Name

Comment

No, this proposal should not be implemented at all.

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer No

Document Name

Comment

We agree with the implementation plan for R6. However, since R9 is administrative in nature, we do not agree with the implementation plan for R9.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer No

Document Name

Comment

Exelon supports the comments submitted by the EEI on behalf of its members.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Exelon supports the comments submitted by the EEI on behalf of its members.

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis

Answer No

Document Name	
Comment	
Please see response to Question #5	
Likes 0	
Dislikes 0	
Response	
Richard Vendetti - NextEra Energy - 5	
Answer	No
Document Name	
Comment	
R6 should coincide with the AAR ratings effort. Two years for R9 is appropriate.	
Potential conflict of implementation with FERC 881	
Nextera generally supports comments submitted by EEI	
Likes 0	
Dislikes 0	
Response	
Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	No
Document Name	
Comment	
See comments submitted by the Edison Electric Institute.	
EEI does not support the proposed Implementation Plan because it is flawed due to the lag between the core of FAC-008 changes and the enforcement date of Requirement R6. To address this concern, we suggest that FAC-008-6 become effective 15 months after government authority approval and if R9 remains a part of this Reliability Standard, the effective date of R9 should be 12 months after the effective date of FAC-008-6.	
Likes 0	
Dislikes 0	
Response	

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer No

Document Name

Comment

ITC supports the changes recommended by EEI.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer No

Document Name

Comment

EEI does not support the proposed Implementation Plan because it is flawed due to the lag between the core of FAC-008 changes and the enforcement date of Requirement R6. To address this concern, we suggest that FAC-008-6 become effective 15 months after government authority approval and if R9 remains a part of this Reliability Standard, the effective date of R9 should be 12 months after the effective date of FAC-008-6.

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer No

Document Name

Comment

CEHE does not support the proposed implementation plan because of the lag between the core of FAC-008 changes and the enforcement date of Requirement R6. Additionally, CEHE does not support the implementation plan because the plan includes Requirement R9, which CEHE is not supporting.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer No

Document Name

Comment

The NAGF notes that the proposed Requirement R6, specifically the meaning of “jointly owned”, may require changes to GO facility rating methodologies which could cause implementation to extend beyond the proposed 12-month timeframe.

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 6

Answer No

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer No

Document Name

Comment

EI does not support the proposed Implementation Plan because it is flawed due to the lag between the core of FAC-008 changes and the enforcement date of Requirement R6. To address this concern, we suggest that FAC-008-6 become effective 15 months after government authority approval and if R9 remains a part of this Reliability Standard, the effective date of R9 should be 12 months after the effective date of FAC-008-6.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer No

Document Name

Comment

Evergy supports and incorporates by reference the comments of the Edison Electric Institute (EEI) for question #4.

Likes 0

Dislikes 0

Response

Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3

Answer No

Document Name

Comment

Clarity needs to be brought to the proposed changes before the implementation plan can be accessed.

Likes 0

Dislikes 0

Response

Leslie Hamby - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer No

Document Name

Comment

While SIGE does not oppose the proposed Implementation Plan timeframes, SIGE does not agree with the proposed R6 revisions and R9 language as written.

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer	No
Document Name	
Comment	
SDGE agrees with EEI's comments and therefore disagree with the proposed Implementation Plan.	
Likes 0	
Dislikes 0	
Response	
Hillary Creurer - Allete - Minnesota Power, Inc. - 1	
Answer	No
Document Name	
Comment	
Minnesota Power supports MRO's NERC Standards Review Forum's (NSRF) comments.	
Likes 0	
Dislikes 0	
Response	
Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC	
Answer	No
Document Name	
Comment	
Xcel Energy supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1	
Answer	No
Document Name	

Comment

ConEdison does not support the proposed Implementation Plan because it is flawed due to the lag between the core of FAC-008 changes and the enforcement date of Requirement R6. To address this concern, we suggest that FAC-008-6 become effective 15 months after government authority approval and if R9 remains a part of this Reliability Standard, the effective date of R9 should be 12 months after the effective date of FAC-008-6.

Likes	0
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Dislikes	0
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Response**Gary Trezza - Long Island Power Authority - 1 - NPCC**

Answer	No
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Document Name	
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Comment

Implementation date for R6 should be the same as R9, which is 24 months, in lieu of AAR implementation by July 2025.

Likes	0
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Dislikes	0
----------	---

Response**Wendy Kalidass - U.S. Bureau of Reclamation - 5**

Answer	No
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Document Name	
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Comment

Reclamation does not agree.

Recommend a 3-year implementation plan for requirement R6.

Recommend a 3-year implementation plan for requirement R9.

Likes	0
-------	---

Dislikes	0
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Response

Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies

Answer	No
Document Name	
Comment	
<p>The proposed Implementation Plan seems to introduce a 12-month enforceability gap for R6. The proposed Implementation Plan for R6 should read: "Applicable Entities shall not be required to comply with Requirement R6, subsection 6.1 until (12) months after the effective date." Alternatively, FAC-008-5 R6 could remain in effect until the implementation of FAC-008-6 R6 is complete.</p>	
Likes 0	
Dislikes 0	
Response	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	No
Document Name	
Comment	
<p>The addition of R9 will create a lot of additional administration to develop and support.</p>	
Likes 0	
Dislikes 0	
Response	
Alison MacKellar - Constellation - 5	
Answer	No
Document Name	
Comment	
<p>12 months post effective date may not be reasonable based on the response to Q3-entities may have to alter/change methodologies and re-evaluate most limiting elements.</p> <p>Alison Mackellar on behalf of Constellation Segments 5 and 6</p>	
Likes 0	
Dislikes 0	
Response	

Kimberly Turco - Constellation - 6

Answer No

Document Name

Comment

12 months post effective date may not be reasonable based on the response to Q3-entities may have to alter/change methodologies and re-evaluate most limiting elements.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer No

Document Name

Comment

Depending on the meaning of "jointly owned" the implementation of R6 can require more than the proposed 12 months timeframe.

Likes 0

Dislikes 0

Response

Sheila Suurmeier - Black Hills Corporation - 5

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI comments.

Likes 0

Dislikes 0

Response

Micah Runner - Black Hills Corporation - 1

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI comments.

Likes 0

Dislikes 0

Response

Rachel Schuldt - Rachel Schuldt On Behalf of: Josh Combs, Black Hills Corporation, 5, 6, 1, 3; - Rachel Schuldt

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI comments.

Likes 0

Dislikes 0

Response

Claudine Bates - Black Hills Corporation - 6

Answer No

Document Name

Comment

Black Hills Corporation agrees with EEI comments.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer	No
Document Name	
Comment	
Eversource is in support of EEI's comments.	
Likes 0	
Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	No
Document Name	
Comment	
We do not support the changes to R6 and R9 as drafted, therefor we disagree on the implementation plan.	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	No
Document Name	
Comment	
FirstEnergy supports EEI's Comments which state: EEI does not support the proposed Implementation Plan because it is flawed due to the lag between the core of FAC-008 changes and the enforcement date of Requirement R6. To address this concern, we suggest that FAC-008-6 become effective 15 months after government authority approval and if R9 remains a part of this Reliability Standard, the effective date of R9 should be 12 months after the effective date of FAC-008-6.	
Likes 0	
Dislikes 0	
Response	
Robert Follini - Avista - Avista Corporation - 3	

Answer	No
Document Name	
Comment	
The addition of R9 will create a lot of additional administration to develop and support.	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	No
Document Name	
Comment	
The addition of R9 will create a lot of additional administration to develop and support.	
Likes 0	
Dislikes 0	
Response	
Brian Lindsey - Entergy - 1	
Answer	No
Document Name	
Comment	
R6 has a compliance date of 12 months after effective date of FAC-008-6. 12 months may present a challenge to review and revise the process procedures. Recommend that R6 compliance date should be changed to 24 months after the effective date to the align with the compliance date for the new Requirement R9.	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	No

Document Name	
Comment	
In order to determine the sufficiency of the proposed implementation periods, AEP needs clarity regarding the expectations of R6.1. In short, is the expectation that all jointly owned facilities need to be both coordinated and fully documented prior to the enforcement of the requirement? Or instead, may the documenting process *begin* when R6.1 is implemented?	
Likes 0	
Dislikes 0	
Response	
Ben Hammer - Western Area Power Administration - 1	
Answer	No
Document Name	
Comment	
With the ongoing preparations in the United States for the implementation of FERC Order No. 881, it is an inappropriate period to be making additional FAC-008-5 revisions. The Implementation Plan should specify Compliance Dates of twelve (12) months and twenty-four (24) months for Requirement R6 and R9, respectively, after the effective date of Reliability Standard FAC-008-6 or 12 July 2025 (Effective Date of FERC Order No. 881), whichever is later.	
Likes 0	
Dislikes 0	
Response	
Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECl	
Answer	No
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Michiko Sell - Pine Gate Renewables - 5	
Answer	Yes

Document Name**Comment**

The SDT should go back to the original *FAC-008 Facility Ratings* SAR submitted by Tri-State on July 14, 2021, prior to any modifications being made, and determine if the justification, industry need, purpose or goal, and project scope were addressed in Draft 1. If the SDT determines each of these items was sufficiently addressed by Draft 1 and wants to expand the scope of the SAR, strategize where and how additional objectives fit, if, in fact, they fit at all. An additional SAR may need to be submitted to address the expanded scope and additional objectives (e.g., "Ensure that Requirement R6 is reviewed as a risk-based Requirement.")

Likes 0

Dislikes 0

Response**Constantin Chitescu - Ontario Power Generation Inc. - 5****Answer**

Yes

Document Name**Comment**

OPG supports the NPCC RSC's comments.

Likes 0

Dislikes 0

Response**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC****Answer**

Yes

Document Name**Comment**

We are voting "Negative" on the Implementation Plan due to our belief that the proposed Requirement R9 is not necessary and therefore references to it should be removed from the Implementation Plan.

Likes 0

Dislikes 0

Response**David Jendras Sr - Ameren - Ameren Services - 3**

Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro	
Answer	Yes
Document Name	
Comment	
BC Hydro suggests that the implementation plan should allow for an entity to establish an earlier compliance date for Requirement R9 if they so choose.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the proposed Implementation Plan.	
Likes 0	
Dislikes 0	
Response	
Andrew Smith - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	

Comment

None

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Collaborators

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Rhonda Jones - Invenergy LLC - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Adrian Raducea - DTE Energy - Detroit Edison Company - 5, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Matt Lewis - Lower Colorado River Authority - 1

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC RSC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Colin Chilcoat - Invenergy LLC - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donna Wood - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Dwanique Spiller - Berkshire Hathaway - NV Energy - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Shannon Mickens On Behalf of: Matthew Harward, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Joseph McClung - JEA - 1

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<p>Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD</p>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<p>Ryan Strom - Ryan Strom On Behalf of: Carl Spaetzel, Buckeye Power, Inc., 4, 3, 5; Jason Procuniar, Buckeye Power, Inc., 4, 3, 5; Kevin Zemanek, Buckeye Power, Inc., 4, 3, 5; - Ryan Strom, Group Name Buckeye Power Group</p>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<p>Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1</p>	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Junji Yamaguchi - Hydro-Quebec (HQ) - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Al McMeekin - Facility Ratings Task Force - NA - Not Applicable - NA - Not Applicable

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Sean Bodkin - Dominion - Dominion Resources, Inc. - 5,6, Group Name Dominion

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nicolas Turcotte - Hydro-Quebec (HQ) - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
David Rivera - New York Power Authority - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Israel Perez - Israel Perez On Behalf of: Mathew Weber, Salt River Project, 3, 1, 6, 5; Sarah Blankenship, Salt River Project, 3, 1, 6, 5; Thomas Johnson, Salt River Project, 3, 1, 6, 5; Timothy Singh, Salt River Project, 3, 1, 6, 5; - Israel Perez	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Alyssia Rhoads - Public Utility District No. 1 of Snohomish County - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; John Merrell, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 1, 4, 5, 6, 3; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Donald Lock - Talen Generation, LLC - 5	
Answer	Yes
Document Name	
Comment	

Likes 0

Dislikes 0

Response

Christine Kane - WEC Energy Group, Inc. - 3, Group Name WEC Energy Group

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name

Comment

Likes 2 Lincoln Electric System, 5, Millard Brittany; American Municipal Power, 5, Ritts Amy

Dislikes 0

Response

Tammy Porter - Tammy Porter On Behalf of: Byron Booker, Oncor Electric Delivery, 1; - Tammy Porter

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company	
Answer	
Document Name	
Comment	
No comments at this time.	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	

Texas RE is concerned that FAC-008-5 Requirement R6 is being retired 12 months before FAC-008-6 Requirement R6 is effective. This presents a gap in the compliance required during the intermediate timeframe from the retirement of FAC-008-5 and the effective date for FAC-008-6 R6.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

Document Name

Comment

WECC has no comment on the Implementation Plan.

Likes 0

Dislikes 0

Response

5. Provide any additional comments for the standard drafting team to consider, if desired.

Ben Hammer - Western Area Power Administration - 1

Answer

Document Name

Comment

none

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

Document Name

Comment

WECC appreciates the Technical Rational that indicates that mechanical components may be included in the entity's R1 documentation, but suggests that this clarification be added to the Requirement.

Likes 0

Dislikes 0

Response

Brian Lindsey - Entergy - 1

Answer

Document Name

Comment

No Comment

Likes 0

Dislikes 0

Response

Andy Thomas - Duke Energy - 1,3,5,6 - SERC,RF

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Todd Bennett - Associated Electric Cooperative, Inc. - 3, Group Name AECI

Answer

Document Name

Comment

AECI acknowledges the efforts of the drafting team and appreciates the opportunity to comment on this important matter. AECI provides the following alternative approaches to support the draft R6 risk based approaches proposed by the drafting tem:

• Incorporate a rating error tolerance concept similar to NERC Standard BAL-005-1 R3.

• Revise FAC-008-5 to allow an entity to identify, assess, and correct Facility Rating inconsistencies for R6 Facility Ratings without them being a violation of the Standard.

• Revise FAC-008-5 to incorporate competency-based requirements such as training.

Likes 0

Dislikes 0

Response

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

FAC-008 exists to prevent electrical overloading and Facility damage. The NSRF does not agree that mechanical limits be included in FAC-008, this needs to be addressed in the Standard's Requirements and not just the technical rationale. Mechanical limits can be addressed through standards such as MOD-025, MOD-032 and others.

Likes	1	Lincoln Electric System, 5, Millard Brittany
Dislikes	0	
Response		
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman		
Answer		
Document Name		
Comment		

MPC has several comments for the consideration of the SDT:

- R6.1, bullet point 1: MPC suggest modifying the language as follows:
 - “Entities shall use the most limiting Equipment Rating of their solely owned Elements and the most limiting Equipment Rating(s) from the other Element owner(s) when ratings are provided by the other Element owner(s).”
 - As currently written, it is not clear how this requirement would be applied in a situation where the other joint owner, who’s methodology has resulted in the most limiting rating for the jointly owned element, has not shared their rating or has not shared the rating in a timely manner.
- R6.1, bullet point 2: This language is duplicative of the first bullet point. If an entity is required to use “the most limiting Equipment Rating(s) from the other Element owner(s)”, then each entity should be using the same rating for a jointly owned piece of equipment. Requiring entities to designate which owner is responsible for developing the most limiting Equipment Rating for the shared element adds compliance and administrative burden without any reliability benefit.
- R9: It is not clear what is meant by “extent of condition analysis”. MPC proposes the following language for parts 9.2 and 9.3, including a new part 9.4:
 - 9.2: Determine if it is possible, as determined by the entity, that the identified discrepancy affects multiple Facilities or other similar Elements.
 - 9.3: If it is possible, as determined by the entity, that the identified discrepancy affects multiple Facilities or other similar Elements, determine the full effect of the discrepancy on the impacted Element and determine if the discrepancy exists on similar Elements.
 - 9.4: Develop a corrective action plan to correct any identified discrepancies, including the initial discrepancy, and any other related discrepancies at other Facilities or involving similar Elements.

As an alternate suggestion, Minnkota appreciates a comment submitted by WECC Entity Monitoring:

- Recommend changing R9 to be performance based like R5 of PRC-004 rather than a process/administrative requirement. Remove the need for a process and make the performance requirement something like "when a discrepancy is identified, correct the applicable rating, determine if the error applies to other equipment and correct any additional errors found." Could also consider or require some sort of time limit.

Furthermore, R9 could be extended to include all discrepancies, including discrepancies in the Facility Ratings for the most Limiting Elements. The deciding factor for whether a discrepancy occurs on a most Limiting Element vs a non-most Limiting Element is primarily luck. It seems odd to self-report on one discrepancy but not on another purely on account of chance. Requiring a CAP for any discrepancy and clarifying that an entity will only violate FAC-008-6 R6 if they fail to establish and complete a CAP in some yet-to-be-defined reasonable period would remove a significant compliance and administrative burden while supporting reliability. If the ERO has an interest in data that is currently being gathered via reported non-compliance with FAC-008-5, then a data request could be established to report identified discrepancies. This change would make R6 risk-based.

Minnkota also appreciates similar comments submitted by AECI:

- AECI acknowledges the efforts of the drafting team and appreciates the opportunity to comment on this important matter. AECI provides the following alternative approaches to support the draft R6 risk based approaches proposed by the drafting term:
 - Incorporate a rating error tolerance concept similar to NERC Standard BAL-005-1 R3.

- Revise FAC-008-5 to allow an entity to identify, assess, and correct Facility Rating inconsistencies for R6 Facility Ratings without them being a violation of the Standard.
- Revise FAC-008-5 to incorporate competency-based requirements such as training.

Likes 0

Dislikes 0

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

FE agrees with EEI's comments which state:

While EEI generally supports the intent of the changes to Requirement R6, additional clarification is needed to the two types of Joint Ownership as defined in the Technical Rationale. To address those concerns, we offer the following for consideration:

R6 Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and Jointly Owned BES Facilities. Facility Ratings for BES Facilities owned exclusively by a single owner shall be consistent with its Facility Ratings methodology or documentation for determining its Facility Ratings. For Jointly Owned BES Facilities, responsible entities shall have Facility Rating that were developed through one of the methods identified in 6.1 below.

6.1 For a Jointly Owned BES Facility the responsible entities shall follow one of the following methods based on the types of ownership of the Facility:

• Each responsible entity shall develop and use the most limiting Equipment Rating of their solely owned Elements along with the most limiting Equipment Rating(s) as provided by the other Element owner(s). In cases where a third entity (e.g. RTO or TOP) coordinates ratings, each entity is only responsible for maintaining the ratings of their solely owned Elements.

- For Facilities where the entirety of the Facility is owned by multiple owners, the owners shall designate a single entity to solely develop the most limiting Equipment Rating(s) for the Element(s) for use as the Facility Rating for the Jointly Owned BES Facility.

Likes 0

Dislikes 0

Response

Andrew Smith - APS - Arizona Public Service Co. - 5

Answer

Document Name

Comment

M6 states that "Where no entity owns a facility in its entirety, each entity shall have evidence to show that its Facility Ratings were developed in accordance with Requirement R6 Part 6.1". APS recommends that only one designated owner should be required to provide evidence for the entirety of the facility. The designated owner should be work with any other own to attain any necessary evidence for the entirety of the facility.

AZPS also recommends removing the word accurate in both R6 and M6 because it is redundant and potentially confusing as nothing is 100% accurate and engineering judgement is involved in determining the facility rating of several components.

Likes 0

Dislikes 0

Response

Jeffrey Streifling - NB Power Corporation - 1

Answer

Document Name

Comment

Revise and clarify the "extent of condition review" language in R9 or define it somewhere.

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer

Document Name

Comment

ATC would advise the SDT to consider the comments of the NERC FRTF sub-team 2 in the drafting of the Standard.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Document Name

Comment

PG&E supports the SDTs efforts as stated in the Technical Rationale that this requirement supports and allows “the freedom to make necessary corrections to Equipment Ratings that do not affect the most Limiting Element within their own process without the administrative overhead of self-reporting”.

PG&E recommends the SDT review options to incorporate this into the Standard Requirement language. For example, specify that R9 applies to all equipment which is not the most limiting element. This should be done since Technical Rationale language is not part of the Requirement and does not have to be used or followed by the Audit Teams.

Likes 0

Dislikes 0

Response

Patricia Lynch - NRG - NRG Energy, Inc. - 5

Answer

Document Name

Comment

After 16 years of FAC-008 implementation, the need for Requirement R9 is an unjustified mandate for Generator Owners. In the Technical Rationale for Requirement R9, the extent of condition review is to discover "Systemic errors" by the R9 process. In the Technical Rationale, please provide an actual example of when and how Systemic errors in Generator Owner's Facility Rating documents led to a significant reliability risk or restricted an ISO's ability to meet load demands. Relative to Section 2.4.1, the application of PRC loadability standards (PRC-023 and PRC-025) preclude relay protective devices from being the most limiting rating of a Facility. Yet, Section 2.4.1 requires the inclusion of relays to be addressed within the scope of Facility Rating methodology. Their inclusion in the FAC-008 is unnecessary, and it is inaccurate to imply the need to do so.

Likes 0

Dislikes 0

Response

Martin Sidor - NRG - NRG Energy, Inc. - 6

Answer

Document Name

Comment

After 16 years of FAC-008 implementation, the need for Requirement R9 is an unjustified mandate for Generator Owners. In the Technical Rationale for Requirement R9, the extent of condition review is to discover "Systemic errors" by the R9 process. In the Technical Rationale, please provide an actual example of when and how Systemic errors in Generator Owner's Facility Rating documents led to a significant reliability risk or restricted an ISO's ability to meet load demands. Relative to Section 2.4.1, the application of PRC loadability standards (PRC-023 and PRC-025) preclude relay protective

devices from being the most limiting rating of a Facility. Yet, Section 2.4.1 requires the inclusion of relays to be addressed within the scope of Facility Rating methodology. Their inclusion in the FAC-008 is unnecessary, and it is inaccurate to imply the need to do so.

Likes 0

Dislikes 0

Response

Joshua London - Eversource Energy - 1, Group Name Eversource

Answer

Document Name

Comment

Eversource is in support of EEI's comments.

Likes 0

Dislikes 0

Response

Michael Jones - National Grid USA - 1, Group Name National Grid

Answer

Document Name

Comment

Please consider that R9.2 and R9.3, involving extent of condition reviews, appear to be better suited for mitigation plans for self-reports that affect the most Limiting Elements.

Likes 0

Dislikes 0

Response

David Rivera - New York Power Authority - 3

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Sing Tay - Sing Tay On Behalf of: Ruchi Shah, AES - AES Corporation, 5; - Sing Tay

Answer

Document Name

Comment

AESCE would like to reiterate the importance of officially defining “jointly owned” by including it in the Standard or the NERC Glossary of Terms. Having it explained in the technical rationale document will not help during an audit.

Likes 0

Dislikes 0

Response

Kimberly Turco - Constellation - 6

Answer

Document Name

Comment

1. The SAR revised 8/16/2022 identifies a scope including clarifying the term “jointly owned”. As indicated in the response to Q1, this has not been clarified, rather, it is now more subject to interpretation by entities. With the definitions in the Technical Rationale, not in the Glossary of Terms, formal clarification is needed. This also goes beyond the SAR scope of “what information is required to be shared with neighboring entities”. Sharing information and possibly having to re-evaluate MLE due to boundary changes are two different tasks and inconsistent. 2. Recommend including sketches/diagrams showing the boundaries for ‘jointly owned’ Facilities, similar to other standards to identify the specific boundaries for R6. Further Constellation agrees with comments made by NAGF.

Kimberly Turco on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Alison MacKellar - Constellation - 5

Answer

Document Name**Comment**

1. The SAR revised 8/16/2022 identifies a scope including clarifying the term “jointly owned”. As indicated in the response to Q1, this has not been clarified, rather, it is now more subject to interpretation by entities. With the definitions in the Technical Rationale, not in the Glossary of Terms, formal clarification is needed. This also goes beyond the SAR scope of “what information is required to be shared with neighboring entities”. Sharing information and possibly having to re-evaluate MLE due to boundary changes are two different tasks and inconsistent.

2. Recommend including sketches/diagrams showing the boundaries for ‘jointly owned’ Facilities, similar to other standards to identify the specific boundaries for R6.

Further Constellation agrees with comments made by NAGF.

Alison Mackellar on behalf of Constellation Segments 5 and 6

Likes 0

Dislikes 0

Response

Stephen Whaite - Stephen Whaite On Behalf of: Lindsey Mannion, ReliabilityFirst , 10; - Stephen Whaite, Group Name ReliabilityFirst Ballot Body Member and Proxies

Answer**Document Name****Comment**

RF recommends clarifying in the Technical Rationale that the Limiting Element for configurations with non-series collections of equipment is not necessarily the lowest Equipment Rating (e.g., a small cable at the end of a wind farm feeder) but the element that would reach its rating first as load increases. RF also recommends clarifying that multi-unit generating plants should establish separate ratings for individual generators and for shared interconnection Facilities, respecting the Limiting Element for each collection of series equipment.

RF appreciates the efforts of the standard drafting team on this project.

Likes 0

Dislikes 0

Response

Wendy Kalidass - U.S. Bureau of Reclamation - 5

Answer**Document Name****Comment**

Reclamation does not agree with the addition of R9. R9 does not provide value added as reporting discrepancies to NERC are not required.

Likes 0

Dislikes 0

Response

Gary Trezza - Long Island Power Authority - 1 - NPCC

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Dermot Smyth - Con Ed - Consolidated Edison Co. of New York - 1

Answer

Document Name

Comment

While Con Edison generally supports the intent of the changes to Requirement R6, additional clarification is needed to the two types of Joint Ownership as defined in the Technical Rationale. To address those concerns, we offer the following for consideration:

R6 Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and Jointly Owned BES Facilities. Facility Ratings for BES Facilities owned exclusively by a single owner shall be consistent with its Facility Ratings methodology or documentation for determining its Facility Ratings. For Jointly Owned BES Facilities, responsible entities shall have Facility Rating that were developed through one of the methods identified in 6.1 below. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

6.1 For a Jointly Owned BES Facility the responsible shall follow one of the following methods:

-Each responsible entity shall develop and use the most limiting Equipment Rating of their solely owned Elements along with the most limiting Equipment Rating(s) as provided by the other Element owner(s), reconciled for use as the Facility Rating for the Jointly Owned BES Facility.

-The owners shall designate a single entity to solely develop the most limiting Equipment Rating(s) for the Element(s) for use as the Facility Rating for the Jointly Owned BES Facility.

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

Document Name

Comment

AEPC signed on to ACES comments:

It is our opinion that Requirement R1 should be modified to explicitly include mechanical component limitations for Generators and their associated Elements when said mechanical components are more limiting than the thermal ratings. Consider the following hypothetical scenarios as examples:

1. Utility A has a hydro generating facility that is part of the BES per Inclusion I2b. Due to various other environmental compliance requirements, the decision has been made to mechanically reduce the flow rate on a single unit at this facility; however, due to cost concerns no electrical components were modified. This mechanical modification to the turbine limits the overall power rating of the prime mover such that it is now the most Limiting Element. However, due to the GO only considering the thermal ratings of electrical components, the identified Facility Rating no longer accurately reflects the actual available output of the generating facility.

2. Utility B experiences a failure of the GSU on a BES generating unit requiring replacement of the GSU. Due to the long lead times associated with this equipment type, the GO is unable to replace the GSU with a "like in kind" replacement in a timely manner. The GO therefore chooses to replace the failed GSU with one that appropriately rated for the generating unit but has a higher equipment rating than the failed GSU. Prior to the failure, the GSU had been identified as the most Limiting Element; however, due to the higher rating of the replacement GSU, this is no longer the case. The prime mover is now the most Limiting Element; however, due to the GO only considering the thermal ratings of electrical components (i.e. excluding mechanical components), the identified Facility Rating no longer accurately reflects the actual available output of the BES generating unit.

Given that accurate Facility Ratings are critical to the safe and reliable operation of the BES, we recommend the SDT give further consideration to whether mechanical components should be included in Facility Ratings. We believe this is especially important when they are the most Limiting Element as in the hypothetical scenarios presented above.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Ryan Strom - Ryan Strom On Behalf of: Carl Spaetzel, Buckeye Power, Inc., 4, 3, 5; Jason Proconiar, Buckeye Power, Inc., 4, 3, 5; Kevin Zemanek, Buckeye Power, Inc., 4, 3, 5; - Ryan Strom, Group Name Buckeye Power Group

Answer

Document Name

Comment

Buckeye supports the comments made by ACES:

It is our opinion that Requirement R1 should be modified to explicitly include mechanical component limitations for Generators and their associated Elements when said mechanical components are more limiting than the thermal ratings. Consider the following hypothetical scenarios as examples:

1. Utility A has a hydro generating facility that is part of the BES per Inclusion I2b. Due to various other environmental compliance requirements, the decision has been made to mechanically reduce the flow rate on a single unit at this facility; however, due to cost concerns no electrical components were modified. This mechanical modification to the turbine limits the overall power rating of the prime mover such that it is now the most Limiting Element. However, due to the GO only considering the thermal ratings of electrical components, the identified Facility Rating no longer accurately reflects the actual available output of the generating facility.

2. Utility B experiences a failure of the GSU on a BES generating unit requiring replacement of the GSU. Due to the long lead times associated with this equipment type, the GO is unable to replace the GSU with a "like in kind" replacement in a timely manner. The GO therefore chooses to replace the failed GSU with one that appropriately rated for the generating unit but has a higher equipment rating than the failed GSU. Prior to the failure, the GSU had been identified as the most Limiting Element; however, due to the higher rating of the replacement GSU, this is no longer the case. The prime mover is now the most Limiting Element; however, due to the GO only considering the thermal ratings of electrical components (i.e. excluding mechanical components), the identified Facility Rating no longer accurately reflects the actual available output of the BES generating unit.

Given that accurate Facility Ratings are critical to the safe and reliable operation of the BES, we recommend the SDT give further consideration to whether mechanical components should be included in Facility Ratings. We believe this is especially important when they are the most Limiting Element as in the hypothetical scenarios presented above.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Tim Kelley - Tim Kelley On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Fong Mua, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Nicole Looney, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Ryder Couch, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; Wei Shao, Sacramento Municipal Utility District, 3, 6, 4, 1, 5; - Tim Kelley, Group Name SMUD

Answer

Document Name

Comment

SMUD applauds the Standards Drafting Team for the addition of Requirement R9 and its efforts to steer FAC-008 away from a zero-defect Standard when Equipment Rating errors are discovered that do not affect the most Limiting Element or the overall Facility Rating. We agree with the Technical Rationale that the changes in Requirements R6 and R9 will help empower entities to quickly identify and correct Element and Equipment Rating errors.

Likes 0

Dislikes 0

Response

David Jendras Sr - Ameren - Ameren Services - 3

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Shannon Mickens - Shannon Mickens On Behalf of: Matthew Harward, Southwest Power Pool, Inc. (RTO), 2; - Shannon Mickens, Group Name SPP RTO

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Lenise Kimes - City and County of San Francisco - 1 - WECC

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

Joseph Gatten - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC

Answer

Document Name

Comment

Xcel Energy supports EEI comments.

Likes 0

Dislikes 0

Response

Hillary Creurer - Allete - Minnesota Power, Inc. - 1

Answer

Document Name

Comment

Minnesota Power supports MRO's NERC Standards Review Forum's (NSRF) comments.

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Bryan Bennett - Sempra - San Diego Gas and Electric - 3

Answer

Document Name

Comment

SDGE believes that having a single responsible entity for joint facilities may be the best route to go, although we're concerned with:

- what "full access to all records and data from the other owners ... necessary for the development of Facility Ratings" will look like

- determining how multiple entities agree upon the new “responsible entity”
- full responsibility for compliance violations on the new “responsible entity” ... surely there are conceivable scenarios where the non-responsible entities don’t hold up their end of the agreement to provide fully accurate data/documentation

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster On Behalf of: Jeremy Harris, Evergy, 3, 5, 1, 6; Kevin Frick, Evergy, 3, 5, 1, 6; Marcus Moor, Evergy, 3, 5, 1, 6; Tiffany Lake, Evergy, 3, 5, 1, 6; - Alan Kloster

Answer

Document Name

Comment

Evergy is specifically concerned that the purpose of FAC-008 has been subverted by language contained in the Technical Rationale supporting the use of mechanical ratings in the development of GO Facility Ratings. To address our concern, the SDT should clarify that mechanical ratings are not to be used in the development of Facility Ratings. As stated in the FAC-008 Purpose: “A Facility Rating is essential for the determination of System Operating Limits”. In the NERC Glossary of Terms, a Facility is “A set of electrical equipment” and a Facility Rating is the “maximum or minimum voltage, current, frequency, or real or reactive power flow through a facility that does not violate the applicable equipment rating of any equipment comprising the facility.” When you also consider the NERC Glossary definition of System Operating Limits (SOL) it clearly states that an SOL is an electrical value “such as MW, Mvar, amperes, frequency or volts”.

FAC-008 is intended to identify the most limiting electrical equipment of a Facility so that a reliable Facility Rating can be applied to that Facility in order to ensure it can be reliably operated under all operating conditions. That includes operating conditions that might push a resource beyond its rated capability for short periods of time to meet an emergency operating condition. It is for this reason that non-electrical equipment are not considered. The capability of individual generators, including non-electrical limitations are appropriately reported through other Reliability Standards such as MOD-025-2 and TOP-003-4. A Facility Rating developed through the sole use of electrical equipment will provide operators and planners with the electrical limits of their Facilities, thereby allowing planners and operators to plan and operate those facilities reliably even under emergency conditions.” For this reason, the statements suggesting that mechanical ratings may be used by GOs for the determinations of their Facility Ratings in the Technical Rationale should be removed.

Likes 0

Dislikes 0

Response

Selene Willis - Edison International - Southern California Edison Company - 5

Answer

Document Name

Comment

While EEI generally supports the intent of the changes to Requirement R6, additional clarification is needed for the two types of Joint Ownership as defined in the Technical Rationale. To address those concerns, we offer the following for consideration:

While EEI generally supports the intent of the changes to Requirement R6, additional clarification is needed for the two types of Joint Ownership as defined in the Technical Rationale. To address those concerns, we offer the following for consideration:

R6 Each Transmission Owner and Generator Owner shall **have** Facility Ratings for its solely and **Jointly Owned** BES Facilities. **Facility Ratings for BES Facilities owned exclusively by a single owner shall be consistent** with its Facility Ratings methodology or documentation for determining its Facility Ratings. **For Jointly Owned BES Facilities, responsible entities shall have Facility Rating that were developed through one of the methods identified in 6.1 below.** [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

6.1 For a **Jointly Owned** BES Facility the **responsible entities shall follow one of the following methods:**

Each responsible entity shall **develop and use** the most limiting Equipment Rating of their solely owned Elements **and along with** the most limiting Equipment Rating(s) **from as provided by** the other Element owner(s). **In cases where a third entity (e.g. RTO or TOP) coordinates ratings, each entity is only responsible for maintaining the ratings of their solely owned Elements.**

For **Facilities where the entirety of the Facility is owned by** multiple owners, the owners shall designate **a single entity** to solely develop the most limiting Equipment Rating(s) for the Element(s) **for use as the Facility Rating for the Jointly Owned BES Facility.**

Likes 0

Dislikes 0

Response

Kenya Streeter - Edison International - Southern California Edison Company - 6

Answer

Document Name

Comment

See comments submitted by the Edison Electric Institute

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

The NAGF recommends deleting the word “accurately” in the changes proposed for R6. GO’s have always developed Facility Ratings to the best of their ability and use of the word in question tasks auditors with judgements that are subjective in nature.

In addition, the NAGF recommends that the SDT consider including illustrative drawings (similar to CIP-003 or MOD-25) in the proposed standard to help clarify the term “jointly owned”.

The NAGF notes that existing RTO/ISO facility rating processes functionally address facility joint ownership and that any proposed FAC-008 modifications should not undermine such processes.

Likes 0

Dislikes 0

Response

Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Document Name

Comment

CEHE supports the comments as submitted by EEI.

Likes 0

Dislikes 0

Response

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer

Document Name

Comment

While EEI generally supports the intent of the changes to Requirement R6, additional clarification is needed for the two types of Joint Ownership as defined in the Technical Rationale. To address those concerns, we offer the following for consideration:

R6 Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and Jointly Owned BES Facilities. Facility Ratings for BES Facilities owned exclusively by a single owner shall be consistent with Facility Ratings methodology or documentation for determining its Facility Ratings. For Jointly Owned BES Facilities, responsible entities shall have Facility Rating that were developed through one of the methods identified in 6.1 below. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

6.1 For a **Jointly Owned** BES Facility the responsible entities shall follow one of the following methods:

- **Each responsible entity shall develop and use** the most limiting Equipment Rating of their solely owned Elements **along with the most limiting Equipment Rating(s) as provided by** the other Element owner(s). **In cases where a third entity (e.g. RTO or TOP) coordinates ratings, each entity is only responsible for maintaining the ratings of their solely owned Elements.**
- For **Facilities where the entirety of the Facility is owned by** multiple owners, the owners shall designate a **single entity** to solely develop the most limiting Equipment Rating(s) for the Element(s) **for use as the Facility Rating for the Jointly Owned BES Facility.**

Likes 0

Dislikes 0

Response

Gail Elliott - Gail Elliott On Behalf of: Michael Moltane, International Transmission Company Holdings Corporation, 1; - Gail Elliott

Answer

Document Name

Comment

ITC supports the changes recommended by EEI.

Likes 0

Dislikes 0

Response

Romel Aquino - Edison International - Southern California Edison Company - 3

Answer

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response

Matt Lewis - Lower Colorado River Authority - 1

Answer

Document Name

Comment

In place of adding a new requirement, such as R9, adding language in R6 would be more appropriate.

“Each Transmission Owner and Generator Owner shall ‘develop and maintain’ Facility Ratings...”

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 5

Answer

Document Name

Comment

In place of adding a new requirement, such as R9, adding language in R6 would be more appropriate. “Each Transmission Owner and Generator Owner shall ‘develop and maintain’ Facility Ratings...”

Likes 0

Dislikes 0

Response

Alain Mukama - Hydro One Networks, Inc. - 1

Answer

Document Name

Comment

We agree with the changes to R6 to make it a more risk-based requirement by focusing on accurately identifying the most Limiting Element (MLE) rather than other rating discrepancies that would not impact the Facility Rating. It would be beneficial if further clarification is provided explicitly stating that discrepancies with the non-MLE are not a compliance violation so that there is no misinterpretation of this requirement and to ensure it is not audited differently across the regions.

Some of the reporting requirements are extremely bureaucratic and do not add any value. These requirements for evidence should be simplified for efficiency. For example, if RAS approvals are approved and recorded by the Regional process, requirement can be simplified to get an attestation vs 5 years of history of each step and documentation from each step.

With respect to R6.1, we agree that it is the accountability of Facility owners to coordinate the development of a common Facility Rating by requiring the MLE of their solely owned elements and the MLE from other owner(s). We support that the assigned responsibility for coordinating the common Facility Rating is for facility owners, and cannot be undertaken by the ISO/RTO. Consistent with current processes, ISO/RTO, in coordination with facility owners, undertake joint studies to determine the required minimum rating of a Facility. Following that, facility owners will utilize their own facility rating methodology to plan, design, and in-service equipment.

We support the flexibility provided in R9 for each entity to develop their own process and documents related to corrections of Equipment Ratings that do not affect the MLE.

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Document Name

Comment

Requirement R6 applies to both solely owned and jointly owned Facilities, whereas Part 6.1 only applies to jointly owned Facilities. The revised Lower VSL only references Part 6.1, so as written the Lower VSL isn't applicable to solely owned Facilities. The language should be revised to match the other R6 VSLs.

If the proposed R9 is retained, we note that the VSL for R9 addresses failure to include "elements". While this appears to mean that one, two, or all (depending on the VSL) of the Requirement R9 sub-parts (Part 9.1 – 9.3) weren't included in the required process, it is confusing as elsewhere in the standard the term "element" is used to mean a piece of equipment. We suggest rewording to "The entity failed to include one (two or all) of the attributes required by Parts 9.1, 9.2 and 9.3".

Likes 0

Dislikes 0

Response

Richard Vendetti - NextEra Energy - 5

Answer

Document Name

Comment

We appreciate the removal of changes for Requirement R1. It would be good to make sure everyone is aware of this statement: "The SDT notes that the absence of mechanical components does not indicate non-compliance with FAC-008."

Nextera generally supports comments submitted by EEI

Likes 0

Dislikes 0

Response

Answer

Document Name

Comment

It is our opinion that Requirement R1 should be modified to explicitly include mechanical component limitations for Generators and their associated Elements when said mechanical components are more limiting than the thermal ratings. Consider the following hypothetical scenarios as examples:

1. Utility A has a hydro generating facility that is part of the BES per Inclusion I2b. Due to various other environmental compliance requirements, the decision has been made to mechanically reduce the flow rate on a single unit at this facility; however, due to cost concerns no electrical components were modified. This mechanical modification to the turbine limits the overall power rating of the prime mover such that it is now the most Limiting Element. However, due to the GO only considering the thermal ratings of electrical components, the identified Facility Rating no longer accurately reflects the actual available output of the generating facility.
2. Utility B experiences a failure of the GSU on a BES generating unit requiring replacement of the GSU. Due to the long lead times associated with this equipment type, the GO is unable to replace the GSU with a "like in kind" replacement in a timely manner. The GO therefore chooses to replace the failed GSU with one that appropriately rated for the generating unit but has a higher equipment rating than the failed GSU. Prior to the failure, the GSU had been identified as the most Limiting Element; however, due to the higher rating of the replacement GSU, this is no longer the case. The prime mover is now the most Limiting Element; however, due to the GO only considering the thermal ratings of electrical components (i.e. excluding mechanical components), the identified Facility Rating no longer accurately reflects the actual available output of the BES generating unit.

Given that accurate Facility Ratings are critical to the safe and reliable operation of the BES, we recommend the SDT give further consideration to whether mechanical components should be included in Facility Ratings. We believe this is especially important when they are the most Limiting Element as in the hypothetical scenarios presented above.

Thank you for the opportunity to comment.

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Thomas Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis

Answer

Document Name

Comment

The 2021-08 SAR seeks to ensure clarification around "jointly-owned" and the level of detail of component sharing amongst such entities. It goes on to seek "consistent" Facility Ratings which lead to SOL. There's an overall presumption within the proposed language for R6 that two or more entities must have the exact same (i.e., common) limits across a singular Facility based on a singular TO Methodology alone, lest they be deemed to not achieve consistent ratings. Given an evolving industry, PJM finds the proposed language to be restrictive to that singular approach, and placing a prohibition on advanced technologies which can simultaneously respect a multitude of limits (each of merit, and based upon individual TO Rating Methodologies for the respective owners) across an individual facility.

There is not in place today a singular industry-wide TO Rating Methodology, but the proposed language seeks to apply a singular approach on a Facility by Facility basis, established by a singular TO Rating Methodology, for joint-owned Facilities alone. It presumes that all TOP and RC cannot manage

such a distinction in their SOL derivation, respecting each Facility Rating independently. PJM supports the point of view that if a given TOP or RC have systematic restrictions which limit them to use a singular common rating set, that limitation should be managed in their domain, subject to their SOL Methodology evolving. For TOP & RC which can respect the individually determined Rating Sets from their respective TO Rating Methodologies, the proposed language would render that ability as null and void as the owners would be obligated to leverage a singular approach by a singular TO per Facility.

Additionally, while all industry entities have normal and emergency ratings in common, there is variance across emergency ratings within the industry. If one entity has X emergency rating types, and another Y emergency rating types, the proposed language would seem to require a lowest common denominator approach which limits innovation, alters approaches deemed otherwise reliable today, and/or impacts congestion for the entity held to the "designated" jointly-owner's Methodology.

In the inverse, if the "designated" joint-owner is seeking an automated approach to dynamically derive their ratings for a joint-owned facility, the language may subject the non-designated owner to the dynamic approach, even if their systems are established to manage such ratings. PJM suggests that the use of the derived Rating Sets, by TOP and RC leveraging the SOL Methodology, should be the element which either permit such variance and/or inhibit it, not the FAC-008 standard language restricting such variance within the limits themselves.

PJM wants to thank the Standard Drafting Team for their work and dedication to the Project; and to please reach out with any clarifying questions. Thank you.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Document Name

Comment

Exelon supports the comments submitted by the EEI on behalf of its members.

Likes 0

Dislikes 0

Response

Pamela Frazier - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name Southern Company

Answer

Document Name

Comment

The GO function should be removed from this standard. The generator interconnect circuit is radial. The power flow is strictly controlled in this circuit. The FAC-008 standard' purpose is to identify the most limiting element of the equipment analyzed so that overloading and burn down of the equipment can be avoided. With the generator interconnect circuit not being networked (is radial) coupled with the power flow being strictly controlled with the use of closed loop controllers, there is no purpose for these ratings to be formalized. For GOs, the work resulting from the requirements of this standard amounts to a design review of the generating plant and its interconnect circuit and is used only for proving compliance during an audit. Neither the Transmission Operator nor the Generator Operator use this information for anything. This results in the work required to achieve compliance to be an administrative exercise only.

Within the technical rationale document, the second sentence is not true for generators. *"While there are similar requirements in other standards, FAC-008 is the only Standard that focuses on thermal rating capabilities for Generators and their associated Elements"* Any standard that involves the rating on the generator and its facilities, inherently includes the thermal limits of the equipment (MOD-025, MOD-032, PRC-005, PRC-025, e. g.).

Likes 0

Dislikes 0

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer

Document Name

[Project 2021-08 Unofficial Comment Form_MISO_10-19-23.docx](#)

Comment

MISO appreciates the opportunity to provide comments. Our recommendations relate to the notification provisions envisioned under the "Project Scope" (page 2 of this project's SAR):

1. Clarify the term "jointly owned" as it applies to FAC-008, and what information is required to be shared with neighboring entities.

Requirement 8 - MISO recommends requirement R8, Part 8.1 be expanded to include the identity of the owner of the most limiting equipment for *jointly* owned facilities as detailed in Part 8.1.3 below. Knowing the identity of the owner of the most limiting equipment is important for coordination purposes. Particularly as we implement FERC Order 881 and ambient adjusted ratings, we anticipate "the owner of the most limiting equipment for jointly owned facilities" to change more frequently.

R8. Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s):
[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.1.3. Identity of the owner of the most limiting equipment for jointly owned Facilities

Requirement 9 - MISO recommends adding a notification to the Reliability Coordinator when an entity's extent of condition review indicates a discrepancy affects many Facilities and will take an entity time to complete the corrections (see example format in Part 9.4 below).

R9. Each Transmission Owner and Generator Owner shall have a process to correct each rating discrepancy found in either Element or Equipment Rating(s) used to develop Facility Ratings, that includes developing timelines to: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]

9.1. Complete the corrections

9.2. Determine if an extent of condition review is necessary

9.3. Perform extent of condition review when necessary

9.4. If the extent of condition review indicates the discrepancy affects more than X Facilities and will take more than Y days to complete corrections, the entity must notify its Reliability Coordinator within Z days.

Likes 0

Dislikes 0

Response

Kinte Whitehead - Exelon - 3

Answer

Document Name

Comment

Exelon supports the comments submitted by the EEI on behalf of its members.

Likes 0

Dislikes 0

Response

Kennedy Meier - Electric Reliability Council of Texas, Inc. - 2

Answer

Document Name

Comment

Changing "Facilities" to "BES Facilities" in requirement R6 appears to be unnecessary, as the existing definition of "Facility" is already limited to the BES.

Additionally, requirement R9 as currently drafted does not appear to require asset owners to implement the corrective process. ERCOT recommends that "shall have a process" be revised to "shall have and implement a process" in requirement R9.

Finally, ERCOT believes requirement R9 would more effectively enhance reliability if it included guidance on what needs to be included in an extent of condition review and a deadline for entities to complete corrections to rating discrepancies.

Likes 0

Dislikes 0

Response

Constantin Chitescu - Ontario Power Generation Inc. - 5

Answer

Document Name

Comment

OPG supports the NPCC RSC's comments.

Likes 0

Dislikes 0

Response

Mark Flanary - Midwest Reliability Organization - 10

Answer

Document Name

Comment

*MRO believes the proposed revision to R9 tries to address the SAR scope and technical rationale. However, as in its current form, the requirement language does not completely clarify the intent of the requirement. The current requirement language just requires TO and GO **to have a process** to correct rating discrepancies but does not require to implement the process. MRO recommends adding clarifying language to include internal controls such as detective and corrective control to R9; and ensure that the language in requirement is implementable and auditable.*

In addition, since omission, discrepancies, and deficiencies in documentation of non-limiting Equipment Ratings is no longer a violation according to new R6, MRO recommends that this gap is properly addressed by R9.

Also, we recommend revising measure M9 to match the R9 requirements.

Likes 0

Dislikes 0

Response

Marty Hostler - Northern California Power Agency - 4

Answer	
Document Name	
Comment	
<p>We disagree with the SAR. Regardless, the proposed modification don't meet the SAR. There is no clarification of Jointly Owned.</p> <p>STDs should be required to provide a cost estimate and reliability improvement benefit prior to being allowed to have purposals balloted on.</p> <p>This proposal in our view has zero reliability benefit and is just another proposed adminitrative burden and cost with no value to our customers.</p>	
Likes 0	
Dislikes 0	

Response

Jeremy Lawson - Northern California Power Agency - 5

Answer	
Document Name	
Comment	
<p>Please see comments by Marty Hostler.</p> <p>Marty Hostler, P.E. NCPA Reliability Compliance Manager 651 Commerce Drive Roseville, California 95678 Office: 916-781-4230 Cell: 916-953-8574 Fax: 916-783-7693 Marty.hostler@ncpa.com</p>	
Likes 0	
Dislikes 0	

Response

AI McMeekin - Facility Ratings Task Force - NA - Not Applicable - NA - Not Applicable

Answer	
Document Name	Facilities_Graphic_10_11_2023.pptx FAC-008_SDT_Definitions_Proposed_Final.docx FAC-008-6_Redline_Final_Comments.docx
Comment	
Likes 0	
Dislikes 0	
Response	