

Meeting Notes

Project 2020-05 Revisions to FAC-001 and FAC-002

Standard Drafting Team

June 22 and 24, 2021 | 1:30 – 3:30 p.m. Eastern

Administrative

The NERC Antitrust Compliance Guidelines and Public Announcement was reviewed at the start of every conference call by A. Oswald, NERC Standards Developer. Roll Call was done at the beginning of each conference call and quorum was met. The attendance list is included in Attachment 1.

Chair Remarks

The Chair, Delyn Kilpack, opened each meeting by thanking the team and observers for their work thus far on the project.

SAR Review

The SAR was reviewed to remind the team of the four goals of the Standard Drafting Team (SDT). The proposed scope, as detailed in the SAR, is as follows:

1. Consider ways to clarify which entity (entities) are responsible for making the determination of what is considered to be a “material modification” to a Facility, including but not limited to a planned or existing Facility.
2. Consider requiring Facility owners to notify affected entities when making a “material modification” to a Facility, including but not limited to a planned or existing Facility.
3. Consider changing or defining the “materially modifying” term or consider a new defined glossary term, to avoid confusion with similar terminology that is used for a different purpose in the FERC Open Access Transmission Tariff.
4. Consider other manners in which to clarify existing requirements to ensure new or “materially modified” Facilities on the Bulk Electric System (BES) are adequately accounted for to ensure reliability.

Standard Revisions

The team discussed materially modified in FERC language vs NERC use.

- FERC: (term used is material modification) those modifications that have a material impact on the cost or timing of any Interconnection Request with a later queue priority date¹
- NERC: materially modified is used in FAC-001-03 R3 and R4, materially modifying is used in FAC-002-3 R1 – R4

¹ <https://www.ferc.gov/sites/default/files/2020-04/LGIP-procedures.pdf>

- It was also noted that materially changed is used in TPL-001-4 and TPL-001-5.1.

The team discussed other terms that could be used to replace “materially modified.” The term should have no overlap with the FERC definition, as this term has broader applicability than the FERC term.

Suggestions include:

Significant change	Significant modification
Material change	Material update
Substantial modification	Facility change or facility update
Facility modification	Qualified change
Restudy triggering modification	Qualified modification
Qualified update	Facility qualified change

The team discussed whichever term is used going forward, it should cover software changes to inverters, other changes to operating characteristics, and attempt to be technology agnostic. The team proposed two options as paths forward for the project which are listed below:

Option 1: NERC defined term

- What is the term? Suggestions include:
 - Facility change
 - facility update
 - Facility modification
 - Qualified change
 - Material update
- What is included in the term definition?
 - Change the inverter, turbine, generator, or power converter associated with a facility of 10 MW or greater, unless the replacement is in-kind
 - Software changes to inverters
 - Operating characteristics
 - Technology agnostic
- Are there definition of NERC glossary terms that we can borrow/modify?
 - Facility, facility rating, rating, normal rating?

Option 2: No defined term

- Requirements for restudy are determined by some entity and unique to that area
 - What entity should that be: BA/PC/RC/TO/TP?

The team voted and decided to pursue option 2. The results of the vote are included below in Attachment 1. While the team will not create a NERC defined term, the team will move away from using the words “materially modified”. First the team discussed what entity should be responsible for determining the triggers for restudy. It was suggested that in addition to the list provided previously, the GO might have all the expertise needed to make this determination. An additional suggestion was that it be the entities that write the interconnection standards or guidelines, perhaps an ISO. The TP/TO was listed as important for the local area view, while it was stated that the PC would need to also be involved in this process. Team members state that TPL-001 has PC coordination requirements that would bring some of these other entities into the process if the PC was the one responsible for making the determination on what should trigger a restudy. The team voted and determined that the Planning Coordinator was the entity best suited to make this change and the team will draft the initial draft of FAC-001 and FAC-002-4 with that language. The results of the vote are in attachment 1.

The team drafted three options for a new requirement, R6, in FAC-002-4 that would give the PC the power to determine what is materially modified².

R6 Options:

1. Each Planning Coordinator shall define and document what is considered to be materially modified and shall communicate that to the applicable Generator Owner, Distribution Provider, Transmission Owner, and Transmission Planner.
2. Each Planning Coordinator shall define and document what is considered to be materially modified and shall publicly post it.
3. Each Planning Coordinator shall define and document what is considered to be materially modified and shall make it available upon request.

The team voted and decided on draft language option 2. The results of the vote are listed below.

² Term to still be discussed by the team changed

Name	6/22	6/24	Option 1 vs 2	PC as Determining Entity	R6 Draft Language
Delyn Kilpack	Y	Y	2	Y	2
Mohit Singh	Y	Y	2	Y	2
David Brauch	N	Y	X	Y	2
Rajat Majumder	Y	Y	2	Y	X
Luke O’Dea	N	N	X	X	X
David Daniels	Y	Y	2	Y	3
Deborah Currie	Y	Y	2	Y	2
John Bernecker	Y	Y	2	Y	2
Kellen Kinard	Y	Y	2	Y	2
Debby Hammack	Y	Y	X	Y	2
Jianwei (Jay) Liu	Y	Y	2	Y	2