

Conference Call Agenda Project 2010-02 – Connecting New Facilities to the Grid

February 21, 2014 | 11 a.m.-Noon Eastern

Dial-in: 866.740.1260 | Access Code: 6191629 | Security Code: 022114

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Administrative

1. **NERC Antitrust Compliance Guidelines, Public Announcement, Participant Conduct Policy, and Email List Policy***
2. **Introductions**
3. **Meeting Agenda and Objectives**

Agenda Items

1. **Communication**
 - a. Team Rosters
 - i. Internal*
 - ii. External*
 - iii. Role of Project Management and Oversight Subcommittee (PMOS) and FERC Observers
 - b. Listservs
 - i. Team and NERC staff only: fac_sdt
 - ii. Plus list, which includes observers: fac_sdt_plus
 - c. Project Page
2. **Next Steps**
 - a. Action Plan*
 - b. SAR Comments*
 - c. Kickoff Meeting (In Person)
3. **Adjourn**

*Background materials included.

Antitrust Compliance Guidelines

I. General

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

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

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

II. Prohibited Activities

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

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

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

III. Activities That Are Permitted

From time to time decisions or actions of NERC (including those of its committees and subgroups) may have a negative impact on particular entities and thus in that sense adversely impact competition. Decisions and actions by NERC (including its committees and subgroups) should only be undertaken for the purpose of promoting and maintaining the reliability and adequacy of the bulk power system. If you do not have a legitimate purpose consistent with this objective for discussing a matter, please refrain from discussing the matter during NERC meetings and in other NERC-related communications.

You should also ensure that NERC procedures, including those set forth in NERC's Certificate of Incorporation, Bylaws, and Rules of Procedure are followed in conducting NERC business.

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

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

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

- Reliability matters relating to the bulk power system, including operation and planning matters such as establishing or revising reliability standards, special operating procedures, operating transfer capabilities, and plans for new facilities.
- Matters relating to the impact of reliability standards for the bulk power system on electricity markets, and the impact of electricity market operations on the reliability of the bulk power system.
- Proposed filings or other communications with state or federal regulatory authorities or other governmental entities.

Matters relating to the internal governance, management and operation of NERC, such as nominations for vacant committee positions, budgeting and assessments, and employment matters; and procedural matters such as planning and scheduling meetings.

Public Announcements

REMINDER FOR USE AT BEGINNING OF MEETINGS AND CONFERENCE CALLS THAT HAVE BEEN PUBLICLY NOTICED AND ARE OPEN TO THE PUBLIC

Conference call version:

Participants are reminded that this conference call is public. The access number was posted on the NERC website and widely distributed. Speakers on the call should keep in mind that the listening audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

Face-to-face meeting version:

Participants are reminded that this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

For face-to-face meeting, with dial-in capability:

Participants are reminded that this meeting is public. Notice of the meeting was posted on the NERC website and widely distributed. The notice included the number for dial-in participation. Participants should keep in mind that the audience may include members of the press and representatives of various governmental authorities, in addition to the expected participation by industry stakeholders.

Standards Development Process Participant Conduct Policy

I. General

To ensure that the standards development process is conducted in a responsible, timely and efficient manner, it is essential to maintain a professional and constructive work environment for all participants. Participants include, but are not limited to, members of the standard drafting team and observers.

Consistent with the NERC Rules of Procedure and the NERC Standard Processes Manual, participation in NERC's Reliability Standards development balloting and approval processes is open to all entities materially affected by NERC's Reliability Standards. In order to ensure the standards development process remains open and to facilitate the development of reliability standards in a timely manner, NERC has adopted the following Participant Conduct Policy for all participants in the standards development process.

II. Participant Conduct Policy

All participants in the standards development process must conduct themselves in a professional manner at all times. This policy includes in-person conduct and any communication, electronic or otherwise, made as a participant in the standards development process. Examples of unprofessional conduct include, but are not limited to, verbal altercations, use of abusive language, personal attacks or derogatory statements made against or directed at another participant, and frequent or patterned interruptions that disrupt the efficient conduct of a meeting or teleconference.

III. Reasonable Restrictions in Participation

If a participant does not comply with the Participant Conduct Policy, certain reasonable restrictions on participation in the standards development process may be imposed as described below.

If a NERC Standards Developer determines, by his or her own observation or by complaint of another participant, that a participant's behavior is disruptive to the orderly conduct of a meeting in progress, the NERC Standards Developer may remove the participant from a meeting. Removal by the NERC Standards Developer is limited solely to the meeting in progress and does not extend to any future meeting. Before a participant may be asked to leave the meeting, the NERC Standards Developer must first remind the participant of the obligation to conduct himself or herself in a professional manner and provide an opportunity for the participant to comply. If a participant is requested to leave a meeting by a NERC Standards Developer, the participant must cooperate fully with the request.

Similarly, if a NERC Standards Developer determines, by his or her own observation or by complaint of another participant, that a participant's behavior is disruptive to the orderly conduct of a

teleconference in progress, the NERC Standards Developer may request the participant to leave the teleconference. Removal by the NERC Standards Developer is limited solely to the teleconference in progress and does not extend to any future teleconference. Before a participant may be asked to leave the teleconference, the NERC Standards Developer must first remind the participant of the obligation to conduct himself or herself in a professional manner and provide an opportunity for the participant to comply. If a participant is requested to leave a teleconference by a NERC Standards Developer, the participant must cooperate fully with the request. Alternatively, the NERC Standards Developer may choose to terminate the teleconference.

At any time, the NERC Director of Standards, or a designee, may impose a restriction on a participant from one or more future meetings or teleconferences, a restriction on the use of any NERC-administered list server or other communication list, or such other restriction as may be reasonably necessary to maintain the orderly conduct of the standards development process. Restrictions imposed by the Director of Standards, or a designee, must be approved by the NERC General Counsel, or a designee, prior to implementation to ensure that the restriction is not unreasonable. Once approved, the restriction is binding on the participant. A restricted participant may request removal of the restriction by submitting a request in writing to the Director of Standards. The restriction will be removed at the reasonable discretion of the Director of Standards or a designee.

Any participant who has concerns about NERC's Participant Conduct Policy may contact NERC's General Counsel.

NERC Email List Policy

NERC provides email lists, or “listservs,” to NERC committees, groups, and teams to facilitate sharing information about NERC activities; including balloting, committee, working group, and drafting team work, with interested parties. All emails sent to NERC listserv addresses must be limited to topics that are directly relevant to the listserv group’s assigned scope of work. NERC reserves the right to apply administrative restrictions to any listserv or its participants, without advance notice, to ensure that the resource is used in accordance with this and other NERC policies.

Prohibited activities include using NERC-provided listservs for any price-fixing, division of markets, and/or other anti-competitive behavior.¹ Recipients and participants on NERC listservs may not utilize NERC listservs for their own private purposes. This may include announcements of a personal nature, sharing of files or attachments not directly relevant to the listserv group’s scope of responsibilities, and/or communication of personal views or opinions, unless those views are provided to advance the work of the listserv’s group. Use of NERC’s listservs is further subject to NERC’s Participant Conduct Policy for the Standards Development Process.

- *Updated April 2013*

¹ Please see NERC’s Antitrust Compliance Guidelines for more information about prohibited antitrust and anti-competitive behavior or practices. This policy is available at <http://www.nerc.com/commondocs.php?cd=2>

Team Roster

Project 2010-02 Standard Drafting Team

	Participant	Entity
Chair	Michael Steckelberg	Great River Energy
Vice Chair	Jeff Gindling	Duke Energy
Member	Zakia El Omari	Georgia Transmission Corporation
Member	John Hagen	Pacific Gas & Electric
Member	Joseph Hay	PJM
Member	Ruth Kloecker	ITC Holdings
Member	Zelalem Tekle	Baltimore Gas and Electric, An Exelon Company
Member	Ganesh Velummylum	Northern Indiana Public Service Co.
NERC Staff	Mallory Huggins (Lead Standards Developer)	NERC
NERC Staff	Erika Chanzas (Supporting Standards Developer)	NERC
NERC Staff	Laura Hussey (Director of Standards Development)	NERC

Version	Date	Description
1.0	02/12/2014	Initial posting

Project 2010-02 Action Plan

Task	Description	Lead	Deliverables	Estimated Completion
Propose Standard Drafting Team (SDT) members	Review SDT nominations and recommend SDT members to the Standards Committee (SC)	Staff	SDT recommendation for SC	Complete
Finalize SDT	Obtain SC approval of SDT members	SC	SC approval	Complete
Advise SDT members	Advise SDT members and leadership of status and share logistical information	Staff	Email to SDT including rosters, action plan, first conference call date, Doodle poll for first in-person meeting, and other pertinent information	Complete
Kickoff Conference Call	Discuss contents of logistical email; answer questions; discuss scope of project and SAR comments	Staff and SDT	Meeting agenda and notes Follow-up email regarding next steps	February 21, 2014
Kickoff Meeting (In Person)	Review SAR comments, develop responses to SAR comments; develop redlines to FAC-001-1 and FAC-002-1	Staff and SDT	Meeting agenda and notes Consideration of Comments form Final SAR Redline and clean FAC-001-1 and FAC-002-1 Implementation Plan Mapping Document Consideration of Issues and Directives VRF/VSL Justification document Comment Form	TBD (March 2014)
Obtain SC Approval for Initial Comment and Ballot Period	Present standards to SC for approval before first posting	SC	SC approval	April 9, 2014

Task	Description	Lead	Deliverables	Estimated Completion
Initial Comment and Ballot Period	Post FAC-001-1 and FAC-002-1 for 45-day industry comment and ballot period	Staff	After staff review, final versions of: Consideration of Comments form Final SAR Redline and clean FAC-001-1 and FAC-002-1 Implementation Plan Mapping Document Consideration of Issues and Directives VRF/VSL Justification document Comment Form	Mid-April 2014
Webinar	Advise industry of SDT's proposed changes	SDT Chair; Staff	PowerPoint Presentation	TBD – during posting period
SDT Meeting	Review and respond to comments; revise as necessary	SDT	Meeting agenda and notes Consideration of Comments form Redline and clean FAC-001-1 and FAC-002-1 Implementation Plan Mapping Document Consideration of Issues and Directives VRF/VSL Justification document Comment Form	Mid-June 2014
Additional Comment and Ballot Period – ONLY IF NEEDED	Post FAC-001-1 and FAC-002-1 for additional 45-day industry comment and ballot period	Staff	After staff review, final versions of: Consideration of Comments form Final SAR Redline and clean FAC-001-1 and FAC-002-1 Implementation Plan Mapping Document Consideration of Issues and Directives VRF/VSL Justification document Comment Form	Early July 2014
Webinar	Advise industry of SDT's proposed changes	SDT Chair; Staff	PowerPoint Presentation	TBD – during posting period

Task	Description	Lead	Deliverables	Estimated Completion
SDT Meeting	Review and respond to comments; prepare documents for final ballot	SDT	Meeting agenda and notes Consideration of Comments form Redline and clean FAC-001-1 and FAC-002-1 Implementation Plan Mapping Document Consideration of Issues and Directives VRF/VSL Justification document	September 2014
Final Ballot	Post FAC-001-1 and FAC-002-1 for 10-day final ballot	Staff		September 2014
Board of Trustees Adoption	Present standards to Board for adoption	Staff	Final standards, Implementation Plan, Mapping Document, Consideration of Issues and Directives, and VRF/VSL Justification Document (all posted) Board write-up	November 2014
FERC Filing	File standards with FERC for approval	Legal Staff	Petition for Approval	TBD

Consideration of Comments

Project 2010-02 Connecting New Facilities to the Grid

The FAC FYR Drafting Team thanks all commenters who submitted comments on the SAR. These standards were posted for a 30-day public comment period from December 12, 2013 through January 17, 2014. Stakeholders were asked to provide feedback on the standards and associated documents through a special electronic comment form. There were 26 sets of comments, including comments from approximately 100 different people from approximately 72 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the standard's [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf

Index to Questions, Comments, and Responses

1. Do you agree with this scope? If not, please explain.11

2. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.19

3. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance:.....23

4. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:26

5. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.29

6. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:31

The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Janet Smith	Arizona Public Service Company	X		X		X	X				
No Additional Responses													
2.	Group	Guy Zito	Northeast Power Coordinating Council										X
Additional Member		Additional Organization	Region	Segment Selection									
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10									
2.	David Burke	Orange and Rockland Utilities	NPCC	3									
3.	Greg Campoli	New York Independent	NPCC	2									

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
		System Operator																		
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1																
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1																
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10																
7.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5																
8.	Kathleen Goodman	ISO - New England	NPCC	2																
9.	Michael Jones	National Grid	NPCC	1																
10.	Mark Kenny	Northeast Utilities	NPCC	1																
11.	Christina Koncz	PSEG Power LLC	NPCC	5																
12.	Helen Lainis	Independent Electricity System Operator	NPCC	2																
13.	Michael Lombardi	Northeast Power Coordinating Council	NPCC	10																
14.	Alan MacNaughton	New Brunswick Power	NPCC	9																
15.	Bruce Metruck	New York Power Authority	NPCC	6																
16.	Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																
17.	Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																

Group/Individual		Commenter			Organization		Registered Ballot Body Segment									
							1	2	3	4	5	6	7	8	9	10
18.	Roberto Pellgrini	The United Illuminating Company	NPCC	1												
19.	Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1												
20.	David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5												
21.	Brian Robinson	Utility Services	NPCC	8												
22.	Ayesha Sabouba	Hydro One Networks Inc.	NPCC	1												
23.	Brian Shanahan	National Grid	NPCC	1												
24.	Wayne Sipperly	New York Power Authority	NPCC	5												
25.	Ben Wu	Orange and Rockland Utilities Inc.	NPCC	1												
26.	Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3												
3.	Group	Russel Mountjoy	NERC Standards Review Forum		X	X	X	X	X	X						
		Additional Member	Additional Organization	Region	Segment Selection											
1.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6												
2.	Chuck Wicklund	Otter Tail Power Company	MRO	1, 3, 5												
3.	Dan Inman	Minnkota Power Cooperative	MRO	1, 3, 5, 6												
4.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6												

Group/Individual		Commenter			Organization	Registered Ballot Body Segment									
						1	2	3	4	5	6	7	8	9	10
5.	Kayleigh Wilkerson	Lincoln Electric System	MRO	1, 3, 5, 6											
6.	Jodi Jensen	Western Area Power Administration	MRO	1, 6											
7.	Joseph DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6											
8.	Ken Goldsmith	Alliant Energy	MRO	4											
9.	Mahmood Safi	Omaha Public Power District	MRO	3, 4, 5, 6											
10.	Marie Knox	MISO	MRO	2											
11.	Mike Brytowski	Great River Energy	MRO	1, 3, 5, 6											
12.	Randi Nyholm	Minnesota Power	MRO	1, 5											
13.	Scott Bos	Muscatine Power & Water	MRO	1, 3, 5, 6											
14.	Scott Nickles	Rochester Public Utilities	MRO	4											
15.	Terry Harbor	MidAmerican Energy	MRO	1, 3, 5, 6											
16.	Tom Breene	Wisconsin Public Service	MRO	3, 4, 5, 6											
17.	Tony Eddleman	Nebraska Public Power District	MRO	1, 3, 5											
4.	Group	Brandy Spraker		Tennessee Valley Authority		X		X		X	X				
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Joshua David		SERC	1											

Group/Individual		Commenter		Organization		Registered Ballot Body Segment									
						1	2	3	4	5	6	7	8	9	10
2.	Josh Lewey		SERC	1											
3.	David DeLoach		SERC	1											
4.	Dennis Sears		SERC	1											
5.	Lee Thomas		SERC	5											
6.	Tony Segovia		SERC	5											
7.	Tom Vandervort		SERC	5											
5.	Group	David Thorne	Pepco Holdings Inc. & Affiliates			X		X							
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Michael Mayer	Pepco Holdings	RFC	1, 3											
6.	Group	Lousi Slade	Dominion NERC Compliance Policy			X		X		X	X				
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Randi Heise	Dominion	MRO	6											
2.	Connie Lowe	Dominion	RFC	5, 6											
3.	Michael Crowley	Dominion	SERC	1, 3											
4.	Mike Garton	Dominion	NPCC	5, 6											
5.	Louis Slade	Dominion	SERC	5, 6											
7.	Group	Colby Bellville	Duke Energy			X		X		X	X				
	Additional Member	Additional Organization	Region	Segment Selection											
1.	Doug Hills	Duke Energy	RFC	1											
2.	Lee Schuster	Duke Energy	FRCC	3											
3.	Dale Goodwine	Duke Energy	SERC	5											
4.	Greg Cecil	Duke Energy	RFC	6											
8.	Group	Jason Mashall	ACES Standards Collaborators								X				

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
Additional Member		Additional Organization	Region	Segment Selection									
1.	Scott Brame	North Carolina Electric Membership Corporation	SERC	1, 3, 4, 5									
2.	John Shaver	Arizona Electric Power Cooperative	WECC	4, 5									
3.	Alisha Anker	Prairie Power	SERC	3									
4.	Noman Williams	Sunflower Electric Power Corporation	SPP	1									
5.	Mark Ringhausen	Old Dominion Electric Cooperative	SERC	3, 4									
6.	Mohan Sachdeva	Buckeye Power	RFC	3, 4									
7.	Bob Solomon	Hoosier Energy	RFC	1									
8.	Shari Heino	Brazos Electric Power Cooperative	ERCOT	1, 5									
9.	Patrick Woods	East Kentucky Power Cooperative	SERC	1, 3, 5									
10.	John Shaver	Southwest Transmission Cooperative	WECC	1									
9.	Group	Pamela Hunter	Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing										
				X		X		X	X				
No Additional Responses													
10.	Group	Robert Rhodes	SPP Standards Review Group										
					X								
Additional Member		Additional Organization	Region	Segment Selection									
1.	Mo Awad	Westar Energy	SPP	1, 3, 5, 6									
2.	Greg Froehling	Rayburn Country Electric Cooperative	SPP	3									
3.	Bo Jones	Westar Energy	SPP	1, 3, 5, 6									

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
4.	Shannon Mickens	Southwest Power Pool	SPP	2																
5.	James Nail	City of Independence, MO	SPP	3																
6.	Kevin Ninceheler	Westar Energy	SPP	1, 3, 5, 6																
7.	Mahmood Safi	Omaha Public Power District	MR O	1, 3, 5																
8.	Ashley Stringer	Oklahoma Municipal Power Authority	SPP	4																
9.	Harold Wyble	Kansas City Power & Light	SPP	1, 3, 5, 6																
11.	Individual	Jonathan Appelbaum	The United Illuminating Company		X															
12.	Individual	Ashley Stringer	Oklahoma Municipal Power Authority					X												
13.	Individual	Chuck Matthews	BPA/TPP		X														X	
14.	Individual	Anthony Jablonski	ReliabilityFirst																	X
15.	Individual	Michael Falvo	Independent Electricity System Operator			X														
16.	Individual	Shirley Mayadewi	Manitoba Hydro		X		X		X	X										
17.	Individual	Andrew Z. Pusztai	American Transmisiion Company, LLC		X															
18.	Individual	Michelle D'Antuono	Occidental Energy Ventures Corp.						X											
19.	Individual	Chris Scanlon	Exelon Companies		X		X	X	X	X										
20.	Individual	Thomas Foltz	American Electric Power		X		X		X	X										
21.	Individual	Patti Metro	National Rural Electric Cooperative Association (NRECA)		X		X	X												
22.	Individual	Mitch Colburn	Idaho Power Co.		X															
23.	Individual	Scott Langston	City of Tallahassee		X															
24.	Individual	Bill Fowler	City of Tallahassee				X													
25.	Individual	Ayesha Sabouba	Hydro One		X		X													
26.	Individual	Christina Conway	Oncor Electric Company, LLC		X															

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration:

Organization	Agree	Supporting Comments of "Entity Name"
N/A	N/A	N/A

1. Do you agree with this scope? If not, please explain.

Summary Consideration:

Organization	Yes or No	Question 1 Comment
Northeast Power Coordinating Council	No	Requirement R1.1 should be modified “to ensure that the impact on third parties is appropriately addressed” and include the definition of who the impacted third parties include.
Dominion NERC Compliance Policy	No	Dominion believes that the phrase ‘power pool’ should be removed from FAC-002-1 as we believe that any such planning criteria should have been incorporated into NERC, regional, subregional or Transmission Owner planning criteria by now.
ACES Standards Collaborators	No	(1) We question the need for these two standards at all because of the minimal benefit to reliability of the Bulk Electric System. Nearly all TPs and PCs are subject to performing facility connection studies and having facility connection requirements in a FERC-approved tariff. Even most of those TPs and PCs that traditionally have not been subject to FERC wholesale power regulation have approved tariffs due to the reciprocity requirements that FERC established in the pro forma tariff. That is if they don’t have a reciprocal arrangement (i.e. a tariff), their associated PSE, LSE, and other applicable functions do not qualify for transmission service on a FERC-approved tariff. For the few areas where this is not true, the areas tend to have minimal impact on the BES. Thus, all of the requirements in FAC-001 and FAC-002 would appear to meet Paragraph 81 (criterion B7 - Redundant) because these requirements are already covered by another governmental regulation that requires tariff. We recommend that the SAR be modified to

Organization	Yes or No	Question 1 Comment
		<p>consider other alternatives, such as retirement of these requirements, as these standards are not needed at all.(2) In addition, we do have issues with specific scope items identified in the SAR regarding FAC-002 and discussed below. We do not believe that R1 should be split into separate requirements. Rather, if FAC-002 persists, we think R1 should be revised to refocus the need for the TP and PC to perform assessments on the integration of new or modified facilities. We do not believe additional requirements are necessary to “coordinate and cooperate” because coordination and cooperation are vague and problematic for measuring compliance. These activities are essentially about supplying information. There are already FERC approved tariff requirements that compel the sharing of this information. Thus, the SAR scope should be adjusted accordingly. (3) The scope should be modified to remove the reference in the FAC standards to the TPL standards. PCs and TPs must comply with the TPL standards regardless of what this standard requires. Thus, stating that an evaluation is required per the TPL standards will result in double jeopardy. Because failure to comply with the TPL standards for new or modified facilities will result in a compliance violation of FAC-002. (4) FAC-002 is redundant with the TPL standards and the SAR should be modified to remove these redundancies. TPL-001-4, R1, Part 1.1.3 and R1.3.8 of TPL-001-0.1, TPL-002-0b, and TPL-003-0b already require the PC and TP to evaluate the impacts of new or modified facilities in their TPL assessments. The SAR should be modified to consider the continued need for separate standards and requirements given these TPL requirements are already in existence. The SAR should be clear that if the standards are maintained that technical justification for retaining the requirements should be supplied given the apparent redundancies. (5) We support that the SAR calls for the elimination of redundancy and retirement of requirements with no impact to the reliable operation of the BES through application of the Paragraph 81 criteria. However, we are concerned that the P81 criteria</p>

Organization	Yes or No	Question 1 Comment
		<p>may have not been applied to all requirements based on the posted redline standard. Existing FAC-002-1 R2 would appear to meet Paragraph 81 (criteria B2 - Data Collection/Data Retention, B3 - Documentation, and B4-Reporting). Furthermore, some of the new proposed requirements appear to do little to support reliability. We understand that the redlined standards were written for illustrative purposes and are not an official proposed draft standard. Thus, we will not belabor the point further but encourage the ultimate standards drafting team to include a thorough review of existing and proposed new requirements against Paragraph 81 criteria. If the standards drafting team retains any requirements that appear to meet Paragraph 81 criteria, then significant technical justification should be provided.</p>
SPP Standards Review Group	No	<p>In R1 of FAC-002-1 modification of Facilities is a trigger for conducting assessments of the impact on affected Transmission systems. Has the drafting team given any consideration to providing criteria to use to determine specifically which modifications would be included? For example, changing CTs/PTs on a Facility may have an impact on the BES and need to be factored into interconnection assessments. Would line uprates, such as reconductoring, trigger a similar assessment even though the impact on the BES would in general be positive? Do we need to include clarification within the standard to help the industry decide when to initiate assessments?</p>
The United Illuminating Company	No	<p>Add For FAC-001 R1.1 thru R1.3 should be removed. Add For proposed FAC-002 R5 should be removed since its documentation and data retention. If it must be retained then it should be split up by Entity Type for clarity.</p>
ReliabilityFirst	No	<p>ReliabilityFirst submits the following comment on SAR Under the third bullet under the “Per the FAC Five-Year Review Team Recommendation to Revise FAC-002-1, the drafting team should consider:” section,</p>

Organization	Yes or No	Question 1 Comment
		<p>ReliabilityFirst has issues with using terms such as “coordinating and cooperating” within Reliability Standards. These terms are ambiguous and without being further prescribed, requirements with such terms will lead to confusion and interpretation. Instead of “coordinating and cooperating”, the SAR should speak to the Entities seeking to interconnect to provide the necessary data to the applicable Transmission Planners and Planning Coordinators in order to perform an assessment. Following the assessment, a joint review (though sharing of the assessment results) should be undertaken. ReliabilityFirst has also supplied draft changes to the FAC-001-1 and FAC-002-1 standards for consideration under a separate email to the NERC standards coordinator - Mallory Huggins.</p>
Exelon Companies	No	<p>There are three considerations we would recommend the Standard Drafting Team consider. First, the proposed draft FAC-002 standard seems to change the scope from a requirement for entities seeking to modify the transmission system to coordinate with the Planning Authority and Planning Coordinator to a scope that requires the Planning Authority and Planning Coordinator to perform assessments of new or modified facilities. We believe this is addressed as a requirement for the Planning Authority and Planning Coordinator to perform these assessments in the TPL standards? We think that the primary focus of FAC-002 should remain coordination, as it was, and not the assessment, which is already addressed in the TPL standards. Second, we think consideration should be given to whether the requirement R1.4 (R1.3 in revised draft) in FAC-002 is necessary. Similar to the first comment, this is already addressed in the TPL standards and is redundant here. Requirement 1.2 in the revised draft should be sufficient, it states that compliance with all NERC Reliability Standards shall be maintained, which includes the TPL standards. Third, for requirement R3 in the revised draft of FAC-002, we recommend that additional wording be added to allow handling the addition of smaller end-user loads to the transmission system through the normal annual reliability analysis</p>

Organization	Yes or No	Question 1 Comment
		performed by the Planning Authority or Planning Coordinator. We would recommend this for loads smaller than 20 MW. This would clarify that for these smaller end-user loads, it is not necessary for coordination to occur individually for each instance, but rather can be consolidated into the annual reliability analysis. We believe this is the most effective way to handle these smaller end-use additions.
National Rural Electric Cooperative Association (NRECA)	No	In general, NRECA agrees with the scope of the SAR in the context of completing Five-Year reviews of existing standards and in doing so eliminating redundancies, administrative burdens and addressing appropriate applicability concerns in standards. This being said, it appears that there are still improvements that can be made to address these areas as proposed in the red-line version of the standards included in this SAR. NRECA looks forward to commenting on these standards as the project continues through the development process.
BPA/TPP	Yes	However, it is not clear what is intended by the suggested guidance document referenced in the scope for FAC-001-1.
American Electric Power	Yes	AEP does not object to the proposed modifications if industry believes that these standards are indeed required for reliability. In fact, we find FAC-002-1 R1 through R4 to be much improved by clearly delineating what each functional entity is responsible for. As stated previously however, AEP believes these standards both have marginal (if any) benefit to the reliability of the BES. Entities would not and could not allow other entities to interconnect with them without the prescribed processes being met. As a result, we recommend that these two standards be eliminated in their entirety.
Idaho Power Co.	Yes	With the exception of the following: I do not agree that time horizons should be added to each requirement. I think the time horizon should be

Organization	Yes or No	Question 1 Comment
		<p>left to the TP to determine. Future year base cases and/or projected future conditions are based on assumptions. Modeling new interconnected generation and other facilities is immediately contrary to the existing future year assumptions. The TOP knows the most limiting conditions on its system and is then responsible for operating its system with the interconnected facility based on the studied conditions. The proposal to split R1 into three requirements seems reasonable. However, depending on how the proposal is implemented, confusion and/or unnecessary or redundant reporting may be added for vertically integrated utilities. In regards to impact to third parties, I don't think that TPs should be responsible for identifying and resolving third parties issues caused by modeling issues (i.e. transient data in base cases). Some specificity of "impact" may be beneficial, but may also create incremental challenges to the TP conducting a study if "impacts" is narrowly defined. The other proposed revisions seem reasonable.</p>
<p>Oncor Electric Company, LLC</p>	<p>Yes</p>	<p>With respect to FAC-001-1, Oncor agrees with the FAC FYRT's recommendation to consider retirement of R3.1 and R3.1.3 through R3.1.16 under Paragraph 81 criteria. The FYRT states that R3.1 and R3.1.3 through R3.1.16 are not necessary for reliability (Criterion A) and are redundant (Criterion B7) or generally too prescriptive to be contained in a standard. Oncor agrees with this statement. Regarding FAC-002-1, the proposed Purpose, "To avoid adverse impacts on reliability, assessments must be conducted and coordinated to determine whether a new or modified Facility meets Facility connection requirements", is written more like a measure than a purpose. Oncor recommends revising the language to better reflect the purpose of the Standard. It is Oncor's recommendation that the purpose of the Standard reflects that assessments must be conducted and coordinated to determine the impacts of integrating new or modified Facilities to the reliability of the Transmission system.</p>

Organization	Yes or No	Question 1 Comment
Arizona Public Service Company	Yes	
NERC Standards Review Forum	Yes	
Tennessee Valley Authority	Yes	
Pepco Holdings Inc. & Affiliates	Yes	
Duke Energy	Yes	
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
Oklahoma Municipal Power Authority	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
American Transmisiion Company, LLC	Yes	
Occidental Energy Ventures Corp.	Yes	
City of Tallahassee	Yes	

Organization	Yes or No	Question 1 Comment
City of Tallahassee	Yes	
Hydro One	Yes	

2. The SAR identifies a list of reliability functions that may be assigned responsibility for requirements in the set of standards addressed by this SAR. Do you agree with the list of proposed applicable functional entities? If no, please explain.

Summary Consideration:

Organization	Yes or No	Question 2 Comment
Dominion NERC Compliance Policy	No	Dominion suggests it include Transmission Service Provider. Given that authority for transmission planning (for a very large portion of the BES in the United States) has been turned over to ISO/RTOs, with governing provisions typically included in their respective tariffs, this entity needs to be included. See supporting comments in questions 4 & 5.
ACES Standards Collaborators	No	(1) For FAC-001 inclusion of the TO and GOs that own the interconnecting facility and receive an interconnection request is appropriate. However, we believe that the only applicable entities that should be included in the FAC-002 standard are the PC and TP. The PC and TP ultimately have the responsibility to plan for new facilities and already have existing FERC approved tariff processes to gather the necessary input from the TO, GO and LSE. Thus, requirements for TOs, GOs DPs, and LSEs to “coordinate and cooperate” are unnecessary and should be removed from the standard. (2) Inclusion of both the DP and LSE is redundant. It is the DP that will seek new end-user facilities because it provides and operates “electrical delivery facilities between the transmission system and the End-use Customer” per the NERC functional model. Furthermore, the Appendix 5B - Statement of Compliance Registry Criteria of the Rules of Procedure states very clearly that the DP will also be registered as the LSE “for all load directly connected to their distribution facilities” in Section III.a.4.

Organization	Yes or No	Question 2 Comment
National Rural Electric Cooperative Association (NRECA)	No	NRECA agrees that the applicability for FAC-001 is correct. For FAC-002, the applicability should be modified to include only the PC and TP. The PC and TP ultimately have the responsibility to plan for new facilities and already have existing FERC approved tariff processes to gather the necessary input from the TO, GO and LSE. Thus, requirements for TOs, GOs DPs, and LSEs to “coordinate and cooperate” are unnecessary and should be removed from the standard.
NERC Standards Review Forum	Yes	The NSRF noticed the statement under “Per the FAC Five-Year Review Team Recommendation to Revise FAC-001-1, the drafting team should consider: Modifying R3 to ensure that the impact on third parties is appropriately addressed”. Please assure that the SDT incorporates this statement to be applicable to Functional Entities per the Functional Model. There should not be a Federal Law (i.e. a Requirement) to speaks of coordinating with non-Functional Entities.
American Electric Power	Yes	It is current practice for a regional Transmission Service Provider (e.g. RTO) to specify and require an “Interconnection Service Agreement” for any new Interconnection customer facility (e.g. GO) to be connected and eligible to receive Transmission services. AEP recommends including the TSP in FAC-001’s “Applicability” scope, and making it subject to this standard requirement.
Arizona Public Service Company	Yes	
Northeast Power Coordinating Council	Yes	
Tennessee Valley Authority	Yes	
Pepco Holdings Inc. & Affiliates	Yes	

Organization	Yes or No	Question 2 Comment
Duke Energy	Yes	
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
SPP Standards Review Group	Yes	
The United Illuminating Company	Yes	
Oklahoma Municipal Power Authority	Yes	
BPA/TPP	Yes	
Independent Electricity System Operator	Yes	
Manitoba Hydro	Yes	
American Transmisiion Company, LLC	Yes	

Organization	Yes or No	Question 2 Comment
Occidental Energy Ventures Corp.	Yes	
Exelon Companies	Yes	
Idaho Power Co.	Yes	
City of Tallahassee	Yes	
City of Tallahassee	Yes	
Hydro One	Yes	

3. Are you aware of any regional variances that will be needed as a result of this project? If yes, please identify the regional variance:

Summary Consideration:

Organization	Yes or No	Question 3 Comment
Arizona Public Service Company	No	
Northeast Power Coordinating Council	No	
NERC Standards Review Forum	No	
Tennessee Valley Authority	No	
Pepco Holdings Inc. & Affiliates	No	
Dominion NERC Compliance Policy	No	
Duke Energy	No	
ACES Standards Collaborators	No	
Southern Company: Southern Company Services, Inc.; Alabama Power Company;	No	

Organization	Yes or No	Question 3 Comment
Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing		
SPP Standards Review Group	No	
The United Illuminating Company	Yes	For FAC-002 The revised standard should recognize that in organized markets like ISO-NE the Large Generator Interconnect Process and Process to integrate transmission Facilities is driven by ISO Procedures and Processes. Either in the measures or include in technical guidance to provide compliance guidance.
Oklahoma Municipal Power Authority	No	
BPA/TPP	No	
ReliabilityFirst		
Independent Electricity System Operator	No	
Manitoba Hydro	No	
American Transmisiion Company, LLC	No	

Organization	Yes or No	Question 3 Comment
Occidental Energy Ventures Corp.	No	
Exelon Companies	No	
American Electric Power	No	
National Rural Electric Cooperative Association (NRECA)	No	
Idaho Power Co.	No	
City of Tallahassee	No	
City of Tallahassee	No	
Hydro One	No	

4. Are you aware of any business practice that will be needed or that will need to be modified as a result of this project? If yes, please identify the business practice:

Summary Consideration:

Organization	Yes or No	Question 3 Comment
Arizona Public Service Company	No	
Northeast Power Coordinating Council	No	
Tennessee Valley Authority	No	
Pepco Holdings Inc. & Affiliates	No	
Duke Energy	No	
ACES Standards Collaborators	No	
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company	No	

Organization	Yes or No	Question 3 Comment
Generation and Energy Marketing		
SPP Standards Review Group	No	
Oklahoma Municipal Power Authority	No	
BPA/TPP	No	
Independent Electricity System Operator	No	
Manitoba Hydro	No	
American Transmisiion Company, LLC	No	
Exelon Companies	No	
American Electric Power	No	
National Rural Electric Cooperative Association (NRECA)	No	
Idaho Power Co.	No	
City of Tallahassee	No	
City of Tallahassee	No	

Organization	Yes or No	Question 3 Comment
Hydro One	No	
NERC Standards Review Forum	Yes	Please see question 2. The NSRF is not aware of every Functional Entities' business practices when dealing with customers who wish connect to the electric system.
Dominion NERC Compliance Policy	Yes	Dominion believes that, in organized ISO/RTOs, where transmission planning has been turned over to that entity, interconnection requests are processed pursuant to the terms and conditions in the respective tariff. While we understand, and agree with the SDT, that a reliability standard is necessary to insure that no portion of the BES is excluded, we would like to see acknowledgement that, under these circumstances, the entity that has been delegated the planning authority bears some level of responsibility for compliance with these standards.
Occidental Energy Ventures Corp.	Yes	Although Occidental Energy Ventures Corp ("OEVC") believes that the intent of these two standards are already captured through other mandatory and enforceable mechanisms. In our view, the proposed streamlining of requirements and elimination of redundancy is a promising step in the right direction. Business practices and tariffs should be updated to address the minimum assessments of new Facilities that are necessary to assure that the reliability of the Bulk Electric System is not adversely affected. This would reflect the fact that existing interconnection obligations are very thorough - and the data showing that improper commissioning of facilities is not a major BES threat. At the same time, the two FAC standards could be retired under the Paragraph 81 criteria B7 item iii which states that the "Reliability Standard requirement is redundant with... (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board ("NAESB"), etc.). "

5. Are you aware of any Canadian provincial or other regulatory requirements that may need to be considered during this project in order to develop a continent-wide approach to the standards? If yes, please identify the jurisdiction and specific regulatory requirements.

Summary Consideration:

Organization	Yes or No	Question 4 Comment
Arizona Public Service Company	No	
NERC Standards Review Forum	No	
Tennessee Valley Authority	No	
Pepco Holdings Inc. & Affiliates	No	
Duke Energy	No	
ACES Standards Collaborators	No	
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	No	
SPP Standards Review Group	No	
Oklahoma Municipal Power Authority	No	
Independent Electricity System Operator	No	
American Transmisiion Company, LLC	No	
Occidental Energy Ventures Corp.	No	
Exelon Companies	No	
American Electric Power	No	
National Rural Electric Cooperative Association (NRECA)	No	

Organization	Yes or No	Question 4 Comment
Idaho Power Co.	No	
City of Tallahassee	No	
City of Tallahassee	No	
Hydro One	No	
Northeast Power Coordinating Council	Yes	FERC Tariff and Generator Interconnection Agreements include requirements that must be considered during this project. Specifically, section I.3.9 of the ISO-New England Tariff provides that new generation projects and project uprates, inter alia, must undergo a technical review by ISO-NE (with the assistance of NEPOOL task forces) to determine whether the project/uprate will have a "significant adverse effect on the stability, reliability or operating characteristics of the Transmission Owner's transmission facilities, the transmission facilities of another Transmission Owner, or the system of a Market Participant."
Dominion NERC Compliance Policy	Yes	Yes, certain FERC requirements related to Orders 888, 889, 1000 etc. which call for open transmission access. At the very least, the standards should acknowledge that, in some areas, the Transmission Owner has delegated the responsibility for planning of its Transmission system to another entity. Where this has been done, that entity may share some, or bear all, responsibility for compliance with these reliability standards.
BPA/TPP	Yes	The Large Generation Interconnection Procedures (LGIP) that have been put in place by applicable entities since FERC issued Order 2003-A need to be considered for consistency and possible redundancy.
Manitoba Hydro	Yes	This depends on the details that remain in the proposed "guidance document". For example, compliance of interconnections with Power Quality standards may be a provincial regulation administered by the local utility as opposed to a NERC standard requirement.

6. If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

Summary Consideration:

Organization	Question 4 Comment
Northeast Power Coordinating Council	<p>“Modified” has been added to FAC-002-1 describing facilities. The word “new” is also used. “New” is clear, however, what constitutes a “modified” facility - 10% new, 50% new, 90% new? The Drafting Team should consider adding a Rationale Box explaining what is meant by “modified”.</p>
Dominion NERC Compliance Policy	<p>Dominion does not agree with the SDT recommendation to change the phrase “the interconnected’ to affected in FAC-001-1 @ R3.1 and R3.2. While Dominion believes the SDT wanted, and philosophically supports, the need to insure that the Facility connection requirements are coordinated with all whose Transmission system are affected by the interconnection of a new Facility, we believe the primary requirement should be that the entity’s procedures require notification and coordination of the assessment of new Facilities on the Transmission system to which the new Facility is interconnected. We could support language that also requires notification and coordination with those entities whose Transmission system is expected to be, or has been shown to be, affected by the new Facility. As examples we offer the following: R3.1- Procedures for notification and coordination of joint studies of new Facilities and their impacts on the interconnected Transmission system(s).R3.2. - Procedures for notification and coordination of joint studies to those responsible for the reliability of Transmission system(s) that are expected to be, or that have been shown to be, affected by the new Facility. Dominion suggests the words “or modified’ be struck from the purpose and requirements of FAC-002-1 as the SDT stated in the SAR that the intent of these FAC standards is to address only new facilities. According to the SAR, modifications are to be addressed through the TPL standards. Redline version of FAC-002-1; R5 should be removed per P81 (retirement of this requirement approved by FERC effective 1/21/14)</p>

Organization	Question 4 Comment
BPA/TPP	In general, facility connection requirements may be more focused on what is acceptable from an equipment perspective and may be more applicable during the design and implementation phases of an interconnection. These requirements may differ from requirements to conduct an assessment (e.g. LGIP requirements). The revised Standard should give consideration to having multiple sources for requirements rather than having entities develop redundant requirements.
Oncor Electric Company, LLC	It is Oncor’s understanding the intent and purpose of performing assessments under FAC-002-1 is to determine the impacts of the integration of new or modified Facilities to the reliability of the Transmission system. Oncor interprets and seeks consensus that the scope of such assessments is limited to steady-state, short-circuit, and dynamic studies as necessary. Additionally, the proposed FAC-002-1 R1.2 can be interpreted that the Transmission Planner and Reliability Coordinator performing the assessments would be responsible for ensuring that generation, transmission, and end-user entities seeking to connect to the Transmission system meet the stated reliability standards, planning criteria, and Facility connection requirements. However, the requirement needs to clarify that it is the responsibility of the entity seeking to interconnect to the Transmission system to ensure that it meets such reliability standards, planning criteria, and Facility connection requirements. Ultimately, it is the Transmission Planner’s and Reliability Coordinator’s responsibility to conduct the assessments in accordance with with applicable NERC Reliability Standards; regional, subregional, power pool, and Transmission Owner planning criteria; and Facility connection requirements.
Arizona Public Service Company	No Additional Comments
Exelon Companies	No additional. Thank you for the opportunity to comment.
City of Tallahassee	no other comments
Occidental Energy Ventures Corp.	OEVC recommends more substance around the conditions where a Generator Owner looks to add a third party to the GO-TO interconnection. Whether done voluntarily or involuntarily (e.g.; at the behest of a RTO to relieve congestion), there are reliability and economic considerations which

Organization	Question 4 Comment
	must be addressed. We believe the economic factors by their nature automatically incorporate reliability concerns, and should prevail. As such, interconnection studies related to the new Facility additions would fall under business practices and tariffs - not the FAC standards.
Oklahoma Municipal Power Authority	Requirement R5 (previously R2) should be removed entirely as this is one of the Paragraph 81 requirements that was approved on 12/06/13 by FERC for retirement effective 01/21/2014.
Manitoba Hydro	The drafting team should reference the NERC IVGTF group 1.3 who reviewed the FAC-001 standard and made recommendations for changes. http://www.nerc.com/files/2012_IVGTF_Task_1-3.pdf The guidance document should likely be attached as an appendix so the Responsible Entity knows the minimum set of interconnection requirements that are to be documented. Are there plans to monitor compliance with the interconnection requirements in the revised standard?
NERC Standards Review Forum	The NSRF wishes to thank the Five Year Review Team and NERC in establishing a very thorough SAR. By including items such as; “reliability principles” within the SAR, the reader is presented with all the information required to accomplish a good review.
The United Illuminating Company	The Purpose of FAC-001 and FAC-002 should be changed from the idea of avoiding adverse impact to the idea of supporting reliable operation or providing a adequate level of reliability.
Pepco Holdings Inc. & Affiliates	The revisions are beneficial in simplifying requirements and adding clarity.
Duke Energy	Upon further review of the proposed revision to FAC-001, Duke Energy agrees with the FAC FYRT on the removal of Requirements 3.1.1 - 3.1.14, but our agreement is contingent upon these sub-requirements being moved into a guidance document.
Hydro One	We are in agreement with the proposed changes to the 2 standards and to NPCC RSC comments. It will provide clarifications of the requirements.
ACES Standards Collaborators	We have no additional comments and thank you for the opportunity to comment.

END OF REPORT