

Individual or group. (24 Responses)
Name (13 Responses)
Organization (13 Responses)
Group Name (11 Responses)
Lead Contact (11 Responses)
Question 1 (21 Responses)
Question 1 Comments (24 Responses)
Question 2 (21 Responses)
Question 2 Comments (24 Responses)
Question 3 (21 Responses)
Question 3 Comments (24 Responses)
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Question 5 (23 Responses)
Question 5 Comments (24 Responses)
Question 6 (21 Responses)
Question 6 Comments (24 Responses)
Question 6 (0 Responses)
Question 7 Comments (24 Responses)

Individual
Tammy Porter
Oncor Electric Delivery
Yes
No
Oncor proposes that FAC-002-1 be retired in its entirety due to the following reason. Based on the FYRT's comments, only one requirement, R1, will remain in the Standard. R1 requires certain entities seeking to integrate new facilities to coordination and cooperate on their assessments with their Transmission Planner and Planning Authority to evaluate the reliability impact of the new facilities and their connections on the interconnected transmission systems, and to perform such assessments in accordance with the TPL-001 – TPL-004 Standards. We recommend moving this coordination and cooperation requirement to the TPL-001 – TPL-004 Standards and retiring FAC-002-1 in its entirety.
No
Oncor supports all revisions except for proposed revision to sub-part R3.1.1. We recommend that this provision be added to TPL-001 – TPL-004 Standards. The concept is that “coordinated joint studies of new facilities and their impacts on the interconnected Transmission systems” are in effect coordinated and studied in accordance with the TPL-001 – TPL-004 Standards.
Yes

If the retirement of R3.1.1 is rejected and if the reference to "interconnected transmission systems" is made in a Standard, Oncor recommends keeping the phrase, "interconnected transmission systems" in such Standard. However, if the proposal to change "interconnected transmission systems" to "interconnected transmission system and adjacent transmission system(s)" is made in a Standard, we recommend that "transmission system" and "adjacent transmission system(s)" be clearly defined. Based on our recommendations above, this reference would be deleted from FAC-001-1 and retired with the retirement recommendation of FAC-002-1 stated below.

No

Oncor proposes that FAC-002-1 be retired in its entirety due to the following reason. Based on the FYRT's comments, only one requirement, R1, will remain in the Standard. R1 requires certain entities seeking to integrate new facilities to coordinate and cooperate on their assessments with their Transmission Planner and Planning Authority to evaluate the reliability impact of the new facilities and their connections on the interconnected transmission systems, and to perform such assessments in accordance with the TPL-001 – TPL-004 Standards. We recommend moving this coordination and cooperation requirement to the TPL-001 – TPL-004 Standards and retiring FAC-002-1 in its entirety.

Yes

If the retirement of FAC-002-1 is rejected and if the reference to "interconnected transmission systems" is made in a Standard, Oncor recommends keeping the phrase, "interconnected transmission systems" in such Standard. However, if the proposal to change "interconnected transmission systems" to "interconnected transmission system and adjacent transmission system(s)" is made in a Standard, we recommend that "transmission system" and "adjacent transmission system(s)" be clearly defined. Based on our recommendations above, this reference would be deleted from FAC-001-1 and retired with the retirement of FAC-002-1.

FAC-001-1- make TPL-001 – TPL-004 Standards applicable to Transmission Owner, applicable Generator Owner with respect to “procedures for coordinated joint studies of new Facilities and their impacts on the interconnected Transmission systems” as required under R3.1.1.
 FAC-002-1 – make TPL-001 – TPL-004 Standards applicable to Generator Owner, Transmission Owner, Distribution Provider and Load-Serving Entity with respect to “seeking to integrate generation facilities, transmission facilities, transmission facilities, and electricity end-user facilities as required under R1.

Individual

David Thorne

Pepco Holdings Inc

Yes

Yes

Yes

No
Yes
No
Group
Arizona Public Service Company
Janet Smith
No
If R1 is split into 3 separate requirements care needs to be taken in the section for generator owners. If you have a generation interconnection request, the requestor may not be a registered generator owner; therefore, what responsibility/requirement would they have to coordinate and cooperate with the TP/TC? The LGIP/SGIP does have requirements; however the FYRT has stated that, "regardless of what's covered in a tariff, requirements for interconnecting new facilities still need to be addressed in NERC's Reliability Standards." I would make it clear whether Generation Owner means existing registered GOs or also includes entities requesting generation interconnection, yet are not registered GOs.
Group
Northeast Power Coordinating Council
Guy Zito
Yes
The provisions of FAC-001 besides being needed for reliability are also needed to implement regulatory obligations under other FERC dockets, specifically the FERC LGIA and SGIA obligations. It would be best to keep FAC-001 separate, rather than combine it with FAC-002.
Yes
Yes
We support all of the above revisions.
Yes

R3.1.2 may also be retired since with the recommended revision of FAC-002-1, it is now clear that Transmission Planner and Planning Coordinator have the main role in assessing the new facility connections and therefore “notification of new or modified Facilities to . . . those responsible for the reliability of the interconnected Transmission systems” is redundant. Since FAC-001-1 is applicable only to Transmission Owner and Generator Owner, R3.1.1 could be interpreted as requiring these entities to conduct “joint studies” with the connection applicant. However, as per recommendations for revisions of FAC-002-1 (the above comment) these studies (which are “similar kind of assessment to TPL”) will be conducted by TP and PC (with TO and GO cooperation). Therefore we suggest either combining FAC-001-1 and FAC-002-1 (as recommended in the SAR), or adding clarity for “coordinated joint studies” in R3.1.1.

FAC-001 - There may be overlap between FAC-001 and the currently posted VAR-001-1 Standard. VAR-001 Requirement R4 - It appears that this requirement may already be covered by FAC-001-0 Requirement R2 (proposed FAC-001-1 R3). FAC-001 Interconnection Agreement (IA) - NLTCs (no-load tap changers) are typically mechanically-fixed at time of generator interconnection and are only adjusted, if necessary, during a generator outage. The TOP establishes initial voltage and Real Power requirements in the IA under FAC-001. [The need for a NLTCs change, if any, is typically determined by the TOP through periodic, e.g., seasonal or 5-yr., system studies. NLTCs adjustment are determined by and directed by the TOP.] FAC-001-0 R2 states: R2. The Transmission Owner's facility connection requirements shall address ... R2.1.9. Voltage, Reactive Power, and power factor control. This matter is further complicated by a recommendation by the FAC Five-Year team to delete this section in the pending FAC-001-1 (R3). So, where should the requirement(s) be located? There are two separate needs: (a) to establish the initial interconnection voltage and Reactive Power interface requirements, i.e., NLTC settings from an IA voltage and Reactive Power requirement, e.g., responding to 1.0 p.u. +/-5%, and; (b) the need for a periodic review of NLTC settings to account for system changes identified in periodic system studies, e.g., seasonal or 5-year reviews (VAR-001, R6). Questions for consideration: Is there a need to better coordinate the FAC-001 and VAR-001 standards to prevent overlaps and/or gaps? Where do (a) and (b) above belong in FAC-001, VAR-001 or elsewhere?

Yes

Yes

We recommend revising R1.5 in FAC-002-1 to read “Documentation of the study assumptions and system performance requirements considered in the reliability impact assessments in R1.1 and the jointly coordinated conclusions and recommendations of the reliability impact assessments.” If the connection applicant proposes more than one alternative, all alternatives will be assessed and documented as per R1.1 and R1.5, otherwise, there will not be any “alternatives considered” to be documented.

Retiring R3.1 and R3.1.3 to R3.1.16 in FAC-001-1 will resolve the major flaw in this standard. As mentioned above, FAC-001 and FAC-002 should not be combined.

Individual

Greg Froehling

Rayburn Electric Cooperative
No
Since the Transmission Owner(s) and Generation owner(s) publish their own individual requirements, what assurance do we have that the requirements are supportive of each other as result of this standard. This is where NERC should step back and require the region to establish minimum reliability criteria for facilities within the region. The region does all the planning, modeling and has procedures for new assets within their region... Since it has been stated R3 is too prescriptive that leaves the region to address R1 and R2... I see no real need for reliability nor any gaps created.
Yes
Combine it with FAC-001 again this is a standard that in large part is performed by the region.
Yes
No
Yes
No
In summary I feel the applicability of the standards should go to the regions to "establish the Facility connection and performance requirements" (FAC-001 Purpose) criteria. Applicable entities (TO, GO, LSE and DP) need to follow the regional established criteria "to meet facility connection and performance requirements" (FAC-002 Purpose). Then combine FAC-001 and FAC-002 together into one standard much like the CIP-001 and EOP-004 merger.
Individual
John Seelke
Public Service Enterprise Group
Yes
Yes
Yes
No
Yes
No

Individual
Nazra Gladu
Manitoba Hydro
Yes
(1) Manitoba Hydro believes that it is important to have a document that clearly illustrates the interconnection requirements and is in agreement that FAC-001-1 is necessary for reliability.
Yes
(1) It's important to perform an initial reliability assessment of facility connections and also important to ensure the connection complies with the facility connection requirements in FAC-001-1. Therefore, Manitoba Hydro supports the conclusion that FAC-002-1 is necessary for reliability.
Yes
(1) Manitoba hydro believes that the revisions to FAC-001-1 proposed by the drafting team are sufficient except for retiring all of the subparts of R3. Guidance documents are not mandatory and it will be unclear as to how much material to include in the facility connection document for NERC audit purposes.
Yes
(1) The drafting team also needs to consider the recommendations made by IVGT1-3 in: http://www.nerc.com/files/2012_IVGTF_Task_1-3.pdf
Yes
(1) The revisions to split R1 into three separate requirements are acceptable. This allows an assessment to be of the TPL performance by the appropriate entity. Manitoba Hydro is unclear if coordination and cooperation is a reliability requirement.
Yes
(1) The purpose of FAC-002-1 states that the GO, TO and end-users must meet facility connection requirements. This implies reference to FAC-001-1 with some type of requirement to meet the individual connection requirements in R3. However, this is not explicitly stated. The drafting team should consider whether this must be added to FAC-002-1.
(1) General Comment - replace "Board of Trustees" with "Board of Trustees" throughout the applicable documents/standards for consistency with other standards.
Individual
Thomas Foltz
American Electric Power
No
AEP believes this standard could be eliminated as it is not necessarily needed for reliability. Entities would not allow other to interconnect with them without the appropriate process being met.

No
AEP believes that this standard could be eliminated as it is not necessarily needed for reliability. Entities would not allow other to interconnect with them without the appropriate process being met.
Yes
Please see our response to question number 1, however we do not object to these modifications if the industry believes that the standard is required for reliability.
No
Please see our response to question number 1.
Yes
Please see our response to question number 2, however we do not object to these modifications if the industry believes that the standard is required for reliability.
No
Please see our response to question number 2.
Individual
Mitch Colburn
Idaho Power Company
Yes
Yes
Yes
No
No
I do not agree that time horizons should be added to each requirement. I think the time horizon should be 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 too specific. The other proposed revisions seem

reasonable.
No
Individual
Michael Falvo
Independent Electricity System Operator
Yes
Yes
Yes
No
Yes
No
This is perhaps preemptive or premature but there are draft standards recently posted that propose effective dates and implementation plan that may conflict with the Ontario regulation with respect to making NERC standards effective in Ontario. We therefore kindly remind the SDT to ensure that in the Effective Dates Section of the standard, as well as in the implementation plan, to clearly state that: In those jurisdictions where regulatory approval is required, this standard shall become effective on the xxx day of the yyy calendar quarter after applicable regulatory approval, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities. In those jurisdictions where no regulatory approval is required, this standard shall become effective on the xxx day of the yyy calendar quarter after Board of Trustees approval.
Group
ACES Standards Collaborators
Ben Engelby
Yes
We agree that facility connection requirements should be required for reliability. However, the majority of FAC-001 should be modified. Requirements R1 and R2 largely meet P81 requirements because they are redundant with FERC tariffs (which cover virtually the entire grid due to reciprocity requirements). The requirements that are necessary for reliability are R3.1.1 and R3.1.2, which require responsible entities to have procedures studying the impact of new facilities.

Yes
No
<p>(1) We agree with some of the proposed revisions, such as retiring requirements based on P81 and removing references to “applicable Regional Entity, subregional,” etc. in R1 because it is unclear. However, we have other concerns about revising FAC-001-1, which are stated below. (2) FAC-001-1 is currently pending approval at FERC. We do not understand why the review team recommended revising this standard until a final order is issued by the Commission. Similar to FAC-003-3, we recommend delaying the review of FAC-001-1 until after the Commission issues a final order. (3) We are confused by a couple of statements in the FYRT document. In one place, the recommendation is to remove R1 and R2 or least some elements of these requirements, but then the document states that R1 and R2 do not meet P81 criteria. Which is it? (4) On page 7 of the FYRT document states: “The FYRT believes that only subparts 3.1.1 and 3.1.2, which require Transmission Owners and applicable Generator Owners to have procedures for studying the impact of new Facilities on the Transmission system and procedures for notifying others about new Facilities relate to reliability and should remain in the standard.” While we agree that new Facilities need to be studied and notifications of new Facilities need to be made to other entities with a reliability related-need, we request the FYRT to review these sub-parts against the existing TPL standards and proposed TPL standards to avoid duplication. TPL standards already explicitly require the evaluation of new facilities. (5) Also on page 7, the FYRT document states: “While the FYRT agrees that many documentation requirements are not related to reliability, the team believes that this FAC-001 is about more than documentation; it requires the establishment of Facility connection requirements. ... And although Facility connection requirements are typically covered in tariffs or other similar documents, the requirement for Open Access Transmission Tariffs (OATT) or ISO/RTO requirements varies from region to region. FERC handles market-related documents like tariffs differently from reliability-related documents like standards, and reliability standards should not rely upon market-related documents to address reliability issues.” To state that tariffs are strictly market-related documents is misleading. FERC mandates that every OATT requires utilities to follow good utility practice and have facility connection requirements for reliability purposes. We remind the FYRT that part of the P81 criteria, B7, recommends retirement when a requirement is redundant with: (i) another FERC-approved Reliability Standard requirement(s); (ii) the ERO compliance and monitoring program; or (iii) a governmental regulation (e.g., Open Access Transmission Tariff, North American Energy Standards Board (“NAESB”), etc.). We believe this meets P81 criteria, B7 part (iii).</p>
Yes
<p>(1) We recommend the FYRT review the Independent Expert Review Report, which has several recommendations for revising FAC-001. The experts’ findings state: (a) FAC-001 requires the TO to publish the FCR, but it does not put a requirement on anyone wanting to interconnect to meet the requirements in the FCR. NERC should work with industry to see if enforcement on entities wanting to interconnect should be added to the NERC standards. (b)</p>

FAC-001 R2 meets the Paragraph 81 criteria and should be retired. (c) Streamline the items in Requirement R3 part 3.1 by removing- 3.1.1, 3.1.2, 3.1.3, 3.1.9, 3.1.11, 3.1.13, 3.1.15, and 3.1.16. These are other recommendations that should be taken into consideration. (2) The language in the new R2 and R3 “to simply coordinate and cooperate” sound like P81 requirements. The team should avoid using “coordinate” as it is not measurable. What is actually required? To supply data? To review a study? To agree with results? Also, the team should be careful not to introduce new P81 requirements that are redundant with other standards. For example, the MOD standards are proposing requirements to compel the sharing of data, and we do not need additional requirements in FAC-001 to supply data. Could the sharing of the data per the MOD standards be part of the “coordination” that FYRT is seeking?

No

(1) We disagree with splitting Requirement R1 into three separate requirements. Instead, we recommend retiring the coordination aspects for the GO, TO, DP, and LSE. Coordination and cooperation are some of the most difficult and problematic types of requirements to comply with. There are not clear guidelines on the actions that must occur to prove that coordination took place, and it is completely up to the auditor’s subjectivity to determine if compliance is met. (2) We disagree that FAC-002-1 “is distinct from TPL-001-4 R2”. It states that a Planning Assessment is conducted for existing facilities and FAC-002-1 covers pre-interconnection assessment. TPL-001-4 R2 clearly states that sensitivities must cover “new or modified Transmission Facilities” and “Generation additions, retirements or other dispatch scenarios.” These new facilities would be clearly evaluated before they are ever interconnected. Furthermore, interconnection studies are already required by FERC approved tariffs.

Yes

We recommend the FYRT review the Independent Expert Review Report, which contains several recommendations for FAC-002. The experts’ recommendation is to merge R1.1 and R1.4 and to retire R1.2, R1.3, and R1.5 because they do not support a reliability objective. Further, Requirements R1, R1.1 and R1.4 are not complete or self-contained because the requirements reference the TPL standards, including to an older version and the phrase “seeking to integrate” is not clear. The experts also recommended revising R1.1 and R1.4 to state “the assessment shall address requirements as identified in the Facility Connection Requirements and their performance requirements as identified in the TPL standards.”

(1) The method of posting two separate comment forms for the FAC review project was confusing and unneeded. (2) FYRT did not compare the FAC standards to the existing TPL standards. TPL-001-4 R2 has not been approved by the Commission and assuming that it will be approved is presumptuous. FYRT needs to conduct the comparisons to the existing TPL standards. (3) There is a lack of consistency in the recommendations among the Five Year Review Teams. For example, some teams are suggesting postponement for any revisions to standards that are pending at FERC, while others are recommending making revisions prior to FERC approval. Also, there is overlap with standards projects being reviewed and projects currently under development, which may not be communicated to the separate groups and may result in future revisions. We would like to see the standards reach a steady state, and

the majority of the review teams are recommending further revisions. (4) It appears that multiple reviews are occurring in the same relative time period, including the Independent Expert review, which did not provide the review teams with feedback and recommendations. There is no mention that the FYRT had reviewed the expert recommendations prior to performing its review. Also, there are standards, such as TPL or VAR that should be coordinated with for revisions of the FAC standards. (5) Finally, the Independent Expert Report suggested a new construct be adopted by the ERO for NERC Reliability Standards. Under this construct, FAC-001 and FAC-002 would be combined with TPL-001, MOD-010, MOD-012, MOD-025, MOD-026, and MOD-027 to “Assess Transmission Future Needs and Develop Transmission Expansion Plans – Not Operational Planning.” Has the Five Year Review Team considered this construct? (6) Thank you for the opportunity to comment.

Individual

Michelle R. D'Antuono

Occidental Energy Ventures Corp

Yes

Occidental Energy Ventures Corp (“OEVC”). supports the modifications that the FAC five year review team has recommended. FAC-002-1 includes redundant requirements that are already enforceable in other venues and should be retired. In addition, we are anxious to see the responsibilities associated with new Facility planning to be allocated to the proper entities. It is up to the TP and PC to conduct facility interconnection assessments while the DP/GO/TO/LSE cooperates in the process – and FAC-002-1 should reflect that reality. However, it is premature to suppose that economic responsibilities dictated by the tariff are somehow less enforceable than reliability requirements under the NERC standards. Both roll up to FERC – and are subject to penalties if violations occur. Even if not apparent now, OEVC believes that future evaluations of FAC-002-1 and other similar standards retain the opportunity to eliminate such redundancies.

Group

SPP Sandards Review Group

Robert Rhodes

Yes

Yes

Yes

No
Yes
While we don't have specific language to review regarding proposed changes to R1, we are concerned that any changes forthcoming may conflict with processes and procedures already in use within SPP. There is a good bit of coordination already within SPP and we need to be assured that our coordinated and collaborative processes will survive any proposed changes.
No
We would support the effort to combine FAC-001 and FAC-002.
Group
NERC Compliance Policy
Randi Heise
Yes
Yes
Yes
No
Yes
While Dominion agrees with segregating those entities who perform the assessment from those entities that must cooperate and coordinate in the assessment, we do not agree that Generator Owner must be segregated from other entities in the requirements. Having said this, we have no strong opposition to doing so, either.
No
Dominion commends the Five-Year Review Team's effort to identify redundant requirements within these standards and related TPL standards. In addition, the suggested modification to include adding additional sub-requirements to R1 to address requirements based upon the applicable functional responsibility further support clarity of the requirements. Dominion also suggests the SDT consider the consolidation of Reliability Standard FAC-001 and Reliability Standard FAC-002 into a single standard. Dominion questions why team recommended removing many of the sub-requirements in FAC-001 as too prescriptive, yet left many of them in FAC-008-3 (such as 2.2.1-4 and 3.2.1-4). Dominion also suggests that R8 be removed as it is administrative in nature.
Group

Duke Energy
Colby Bellville
Yes
Yes
Yes
No
Yes
No
Individual
Julaine Dyke
Northern Indiana Public Service Company
Yes
Yes
No
NIPSCO supports bullets 1, 4, 5, 6, and 7 above. Both R1 and R2 references to compliance with “NERC Reliability Standards and applicable Regional Entity, subregional, Power Pool, and individual Transmission Owner planning criteria and Facility connection requirements should be retained. The reference to “...individual Transmission Owner Planning Criteria...” is especially important because it requires each Transmission Planner’s Planning Criteria to be taken into account during a study. This is of great significance because depending upon their location in the grid, some Transmission Owner Planning Criteria needs to be more stringent than others based on neighboring system impact (e.g through flows) on their Bulk Electric System. In order to ensure the system can reliably handle the through flows caused by adjacent RTO, some Transmission Owners have developed more stringent planning criteria to safe guard the reliability of their grid. We want to ensure that our Planning Criteria is taken into account on all studies. The ERO framework established in Order 672 does not address how to handle neighboring system impact like (e.g through flows) on the system. Neither does it establish a framework on considering Individual Transmission Owners Planning Criteria for NERC standards. Order 672 only vaguely talks about regional differences but not the applicability of different transmission owner criteria in the planning study. NIPSCO supports

bullet 3 with the following recommendation: The wording “adjacent Transmission systems” needs to be explicitly included in the requirement language of R3.1.1 and R3.1.2 to account for third party impacts. The phrase “the interconnected Transmission System” alone does not necessarily mean that adjacent systems would be studied. An RTO which oversees the “interconnected Transmission System” spanning several states may not necessarily study an adjacent Transmission Owner’s system which is under the jurisdiction of another RTO. This creates a lot of SEAMS issues. The current TPL (001 -004) standards do not explicitly say if a RTO or TP should address reliability concerns of adjacent systems when they study their system. Therefore, it is imperative we include the wording “adjacent Transmission Systems” at the very least in the FAC standards to at least clarify this ambiguity which was not addressed in the current TPL standards.

No

No

NIPSCO supports bullets 1, 2, 6, and 7 above. R1, R1.2 and R2 references to compliance with “NERC Reliability Standards and applicable Regional Entity, subregional, Power Pool, and individual Transmission Owner planning criteria and Facility connection requirements should be retained. The reference to “...individual Transmission Owner Planning Criteria...” is especially important because it requires each Transmission Planner’s Planning Criteria to be taken into account during a study. This is of great significance because depending upon their location in the grid, some Transmission Owner Planning Criteria needs to be more stringent than others based neighboring system impacts (e.g through flows) on their Bulk Electric System. In order to ensure the system can reliably handle the through flows caused by adjacent RTO, some Transmission Owners have developed more stringent planning criteria to safe guard the reliability of their grid. We want to ensure that our Planning Criteria is taken into account on all studies. The ERO framework established in Order 672 does not address how to handle neighboring system impacts (e.g through flows) on the system. Neither does it establish a framework on considering Individual Transmission Owners Planning Criteria for NERC standards. Order 672 only vaguely talks about regional differences but not the applicability of different transmission owner criteria in the planning study. NIPSCO supports bullet 5 with the following recommendation: The wording “adjacent Transmission systems” needs to be explicitly included in the requirement language of FAC-002-1 R1.1 to account for third party impacts. The phrase “the interconnected Transmission System” alone does not necessarily mean that adjacent systems would be studied. An RTO which oversees the “interconnected Transmission System” spanning several states may not necessarily study an adjacent Transmission Owner’s system which is under the jurisdiction of another RTO. This creates a lot of SEAMS issues. The current TPL (001 -004) standards do not explicitly say if a RTO or TP should address reliability concerns of adjacent systems. Therefore, it is imperative we include the wording “adjacent Transmission Systems” at the very least in the FAC standards to at least clarify this ambiguity which was not addressed in the current TPL standards. Current R1.3 (“While these studies may be performed independently, the results shall be jointly evaluated and coordinated by the entities involved.”) should be added to the

new R1.1. This ensures that reference to coordination with third parties and end users is included in the standard, adjacent transmission systems are evaluated, and any identified impacts are communicated.

No

Group

Tennessee Valley Authority

Brandy Spraker

Yes

Yes

Yes

No

Yes

No

Individual

Andrew Gallo

City of Austin dba Austin Energy

Yes

Yes

No

Austin Energy (AE) agrees with the FYRT's recommendations except for the following two comments: (1) Regarding the FAC-001 purpose statement, AE suggests NERC change "performance requirements" to "performance assessments" and not remove it. (2) AE believes that, with regard to R3.1.1 & R3.1.2 for FAC-001, "adjacent Transmission systems" does not need to be explicitly included. ERCOT has a regional process for handling this process which covers adjacent Transmission systems. We expect this is the case in other regions as well.

No

No
AE agrees with the FYRT's recommendations except for the following comment: AE believes that, with regards to R1.1 for FAC-002, "adjacent Transmission systems" does not need to be explicitly included. ERCOT has a regional process for handling this process which covers adjacent Transmission systems. We expect this is the case in other regions as well.
No
Individual
Andrew Z. Pusztai
American Transmission Company, LLC
Yes
Yes
Yes
No
Yes
No
Group
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing
Pamela Hunter
Yes
Yes
Yes
Yes
The drafting team should consider whether the term "publish" in R1 is clear. If the intended

meaning is the same as the dictionary definition of the word – to make generally known/disseminate to the public – then avoiding further explanation gives entities some flexibility. If not, the term could use further explanation in a reference document, with references to examples of what would fulfill the requirement to “publish” in the context of the standard. In support of reliability principle 3, which states that “information necessary for the planning and operation of the interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably”, the term “publish” should only be interpreted as to make the Facility connection requirements available to those entities responsible for planning and operating the systems reliably. In R3.1.2, the term “as soon as feasible” needs some clarity. In addition, notification should include the Reliability Coordinator.

Yes

No

Group

PacifiCorp

Kelly Cumiskey

Yes

Yes

Yes

No

Yes

No

PacifiCorp appreciates the opportunity to comment and looks forward to the next steps.

Group

Colorado Springs Utilities

Kaleb Brimhall

No

FAC-001-1 could go away and it would not affect reliability. Please give examples where the BES was impacted by issues addressed by this standard. If anything, keep FAC-002-1 which requires coordination and eliminate FAC-001-1. Significant BES modifications are almost

always long range plans that would already be evaluated under the TPL standards. We do not need FAC-001-1 to be more reliable.

Yes

This standard requires the actual evidence of coordination so would better address reliability than FAC-001-1 does. Are there any examples that demonstrate the importance of the issues covered in this standard to the reliability of the BES? Significant BES modifications are almost always long range plans that would already be evaluated under the TPL standards and incorporated into future WECC base cases. Because CSU is a vertically integrated company we do not need FAC-002-1 to be more reliable.

Yes

No Comments

No

No Comments

Yes

No Comments

Yes

R1.1, 1.2, 1.4, and 1.5 are very similar and appear to be repetitive. Clarify, combine, or eliminate to make more clear.

No Comments

Group

Bureau of Reclamation

Erika Doot

Yes

Yes

Yes

Individual

Alice Ireland

Xcel Energy

Yes
Yes
The following item should be added to the drafting team considerations: Determining the applicability of requirements to dispersed generation, including consideration of threshold criteria.