Unofficial Comment Form

Project 2010-02 Connecting New Facilities to the Grid

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=7ce64f98cd50404ea46a5f5a6b4da16f) to submit comments on the Standard Authorization Request (SAR). The electronic comment form must be completed by **January 17, 2014.**

If you have questions please contact Mallory Huggins or by telephone at 202-644-8062.

All documents for this project are available on the [project page](http://www.nerc.com/pa/Stand/Pages/FACFiveYearReviewTeam.aspx).

## Background Information

This posting is soliciting informal comments on a SAR that outlines proposed changes to FAC-001-1 – Facility Connection Requirements and FAC-002-1 – Coordination of Plans for New Facilities. The SAR is implementing the recommendations of the FAC Five-Year Review Team (FYRT). To better illustrate the changes proposed by the SAR, the FYRT has provided redlines of the Purpose, Applicability, and Requirements sections of FAC-001-1 and FAC-002-1. Stakeholders should treat these redlines as supplemental information supporting the SAR, and not as standards on which they must formally comment.

The FAC FYRT was appointed by the Standards Committee Executive Committee on April 22, 2013 as part of NERC’s obligation to conduct periodic reviews of its standards. The FYRT developed six recommendations that were posted for a 45-day comment period from August 1, 2013 through September 16, 2013. The FYRT recommended revising FAC-001-1 and FAC-002-1 to add clarity, remove redundancy, retire requirements with no impact on the reliable operation of the Bulk Electric System (based on application of the Paragraph 81 criteria), and bring compliance elements in accordance with NERC guidelines.( During this posting, the FYRT provided a SAR to further detail its proposed changes, but it did not specifically ask stakeholders to comment on the SAR.) Generally, stakeholders were supportive of the recommendations to revise FAC-001-1 and FAC-002-1, but the FYRT refined its recommendations to better align with stakeholder suggestions. The posted SAR reflects these refinements.

The FAC FYRT also reviewed FAC-003-3, FAC-008-3, FAC-010-2.1, FAC-011-2, FAC-013-2, and FAC-014-2. The FAC FYRT recommended the affirmation of FAC-003-3, FAC-008-3, and FAC-013-2, and those recommendations will be presented to the NERC Board of Trustees in February. The FAC FYRT recommended delaying the review of FAC-010-2.1, FAC-011-2, and FAC-014-2 until FERC issues a final rule on TOP-001-2, TOP-002-3, and TOP-003-2.

A separate effort is ongoing within WECC to review FAC-501-WECC-1.

The complete recommendations of the FAC FYRT are in the Five-year Review Templates posted on the project page.

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. The scope of this project includes:

Per the *FAC Five-Year Review Team Recommendation to Revise FAC-001-1*, the drafting team should consider:

* Revising the title and purpose of the Reliability Standard to reflect the language in the requirements.
* Retiring the following reference in R1: “…compliance with NERC Reliability Standards and applicable Regional Entity, subregional, Power Pool, and individual Transmission Owner planning criteria and Facility connection requirements” because it is redundant with FAC-002-1, R1.2 and built into the ERO framework established in Order 672.
* Retiring all of the subparts in R3, except for R3.1.1 and R3.1.2, and moving them to a guidance document.
* Modifying R3 to ensure that the impact on third parties is appropriately addressed.
* Retiring R4.
* Modifying the VRFs for conformance with NERC’s VRF guidelines.
* Adding Time Horizons to each requirement.

Per the *FAC Five-Year Review Team Recommendation to Revise FAC-002-1*, the drafting team should consider:

* Revising the title and purpose of the Reliability Standard to reflect the language in the requirements.
* Changing “Planning Authority” in the applicability section to “Planning Coordinator” to reflect the Functional Model, as well as the recently revised TPL-001-4.
* Splitting R1 into three requirements to add clarity and better distinguish the actions required of the applicable entities. One requirement should describe the Transmission Planner and Planning Coordinators’ responsibility for conducting assessments. A second requirement should describe the Generator Owners’ responsibility for coordinating and cooperating with the Transmission Planner and Planning Coordinator as those assessments are conducted. A third requirement should describe the Transmission Owners’, Distribution Providers’, and Load-Serving Entities’ responsibility for coordinating and cooperating with the Transmission Planner and Planning Coordinator as those assessments are conducted.
* Revising the subparts of R1 to remove elements that are more appropriate for Measures.
* Modifying R1.1 to ensure that the impact on third parties is appropriately addressed.
* Modifying R1.4 to update the reference to the TPL Reliability Standards to reflect the changes in proposed TPL-001-4.
* Adding Time Horizons to each requirement.

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

[ ]  Yes

[ ]  No

Comments:

1. 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.

[ ]  Yes

[ ]  No

Comments:

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

[ ]  Yes

[ ]  No

Comments:

1. 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:

[ ]  Yes

[ ]  No

Comments:

1. 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.

[ ]  Yes

[ ]  No

Comments:

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

 Comments: