Unofficial Comment Form

Generator Requirements at the Transmission Interface (Project 2010-07)

Please **DO NOT** use this form to submit comments. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=89111ab7d0e24b89936879e4e3a25c24) to submit comments on the first formal posting for Project 2010-07—Generator Requirements at the Transmission Interface. The electronic comment form must be completed by **November 18, 2011.**

[2010-07 Project Page](http://www.nerc.com/filez/standards/Project2010-07_GOTO_Project.html)

If you have questions please contact Mallory Huggins at mallory.huggins@nerc.net or 202-383-2629.

**Background**

With the exception of the errata change to PRC-004-2.1, which is being posted for the first time, this is the second formal comment period and first ballot period for the standards included in Project 2010-07. The standards will be posted for formal comment for 45-days, with a ballot during the final 10 days of the comment period. Ballot pool formation will take place during the first 30 days of the comment period, and [the SDT is hosting an interactive webinar on October 6](https://cc.readytalk.com/cc/schedule/display.do?udc=6r110p1e18xe).

A 30-day formal comment period took place earlier this year, from June 17-July 17, 2011. The SDT thanks all those who provided feedback during that comment period. The SDT has reviewed and considered all comments submitted, and has incorporated many of them into its latest proposed standards, as explained in the Consideration of Comments form posted at the Project 2010-07 project page.

The purpose of Project 2010-07 is to ensure that all generator-owned Facilities are appropriately covered under NERC’s Reliability Standards. While many Generator Owners and Generator Operators operate Elements and Facilities that are considered by some entities to be Transmission, these are most often radial Facilities that are not part of the integrated grid, and as such should not be subject to the same standards applicable to Transmission Owners and Transmission Operators who own and operate Transmission Elements and Facilities that are part of the integrated grid.

As part of the BES, generators affect the overall reliability of the BES.  However, registering a Generator Owner or Generator Operator as a Transmission Owner or Transmission Operator, as has been the solution in some cases in the past, may decrease reliability by diverting the Generator Owner’s or Generator Operator’s resources from the operation of the equipment that actually produces electricity – the generation equipment itself.

The drafting team’s goal is to ensure that an adequate level of reliability is maintained in the BES by clearly describing which standards need to be applied to generator interconnection Facilities that are not already applicable to Generator Owners or Generator Operators. The SDT believes this can be accomplished by properly applying FAC-001, FAC-003, and PRC-004-2.1 to Generator Owners as proposed in the redline standards posted for comment.

**NOTE:** The Project 2007-07 Vegetation Management team will likely be posting a sixth draft of FAC-003-2 for recirculation ballot during the Project 2010-07’s comment period. Both teams acknowledge this overlap, and have been in contact to discuss best strategies moving forward. The changes proposed by the Project 2010-07 SDT in FAC-003-3 are minimal, and serve only to apply the standard and its requirements to qualifying Generator Owners. The SDT recognizes that a number of scenarios may occur with respect to the filing and approval of Versions 2 and 3 of FAC-003 and has attempted to account for those in the FAC-003-3 implementation plan.

**You do not have to answer all questions. Enter all comments in Simple Text Format.**

1. Based on stakeholder comment, the SDT clarified the applicability language of FAC-001-1 and removed the Generator Owner from R4. Do you support the proposed redline changes to FAC-001-1? (Please refer to the posted FAC-001-1 technical justification document for more information about the SDT’s rationale for its changes.)

[ ]  Yes

[ ]  No

Comments:

1. Do you support the one year compliance timeframe for Generator Owners as proposed in the Implementation Plan for FAC-001-1?

[ ]  Yes

[ ]  No

Comments:

1. With respect to FAC-003, many commenters focused on the half-mile qualifier in FAC-003. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: “…that extends greater than one mile beyond the fenced area of the generating station switchyard…” We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.

Taking into consideration that only one of the versions of FAC-003 will actually be implemented, a decision that will be made as Project 2007-07—Vegetation Management moves forward, do you support the proposed redline changes to FAC-003-X and FAC-003-3?

[ ]  Yes

[ ]  No

Comments:

1. Do you support compliance timeframe for Generator Owners as included and explained in the Implementation Plans for FAC-003-X?

[ ]  Yes

[ ]  No

Comments:

1. In the FAC-003-3 implementation plan, the SDT has attempted to account for a number of different scenarios that could play out with respect to the filing and approvals of FAC-003-2 and FAC-003-3. Do you support this approach? If there are other scenarios that the SDT needs to account for, please suggest them here.

[ ]  Yes

[ ]  No

Comments:

1. In its technical justification document, the SDT reviews all standards that had been proposed for substantive modification in the Ad Hoc Group’s original support and explains why, with the exception of FAC-003, modifying them would not provide any reliability benefit. Do you support these justifications? If you believe the SDT needs to add more information to its rationale for any of these decisions, please include suggested language here.

[ ]  Yes

[ ]  No

Comments:

1. The SDT is attempting to modify a set of standards so that radial generator interconnection Facilities are appropriately accounted for in NERC’s Reliability Standards, both to close reliability gaps and to prevent the unnecessary registration of GOs and GOPs at TOs and TOPs. Does the set of standards currently posted achieve this goal?

[ ]  Yes

[ ]  No

Comments:

1. If you answered “yes” to Question 7, are the modifications the SDT has made in this posting the appropriate ones?

[ ]  Yes

[ ]  No

Comments:

1. If you answered “no” to Question 7, what standards need to be added or removed to achieve the SDT’s goal? Please provide technical justification for your answer.

[ ]  Yes

[ ]  No

Comments:

1. Do you have any other comments that you have not yet addressed? If yes, please explain.

[ ]  Yes

[ ]  No

Comments: