NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Standard Authorization Request Form

Title of Proposed Standard:	Various Standards Containing GO/GOP and TO/TOP Requirements
Request Date:	January 15, 2010
SC Approval Date:	January 20, 2010

SAR Requester Information	**SAR Type** (*Check a box for each one that applies.*)	
Name: Ad Hoc Group for Generator Requirements at the Transmission Interface	☐	New Standard
Primary Contact: Scott Helyer	☒	Revision to existing Standards
Telephone: 817-462-1512 Fax:	☐	Withdrawal of existing Standard
E-mail: shelyer@tnsk.com	☐	Urgent Action

Purpose (Describe what the standard action will achieve in support of bulk power system reliability.)

The proposed changes to the requirements and the addition of new requirements will add significant clarity to Generator Owners and Generator Operators regarding their reliability standard obligations at the interface with the interconnected grid.

Industry Need (Provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)

Significant industry concern exists regarding the application of Transmission Owner and Transmission Operator requirements, and more generally, to the registration of Generator Owners and Generator Operators as Transmission Owners and Transmission Operators, based on the facilities that connect the generators to the interconnected grid. The final report of the Ad Hoc Group for Generator Requirements at the Transmission Interface evaluated the issue and proposes a number of changes that adds much needed clarity on the requirements for Generator Interconnection Facilities. Absent these revisions and additional requirements, Generator Owners and Generator Operators are subject to what some believe to be inappropriate registration as Transmission Owners and Transmission Operators to ensure coverage for certain reliability requirements. The modifications and additions recommended wholly and directly address the requirements for Generator Owners and Generator Operators regarding its Generator Interconnection Facilities, and add particular focus on the operation of the interface point at which operating responsibility shifts from the Generator Operator to the Transmission Operator.

The proposal also modifies certain of NERC's existing glossary terms and adds new terms to support the standards modifications.

Brief Description (Provide a paragraph that describes the scope of this standard action.)

32 NERC Reliability Standards contain language regarding generators or generating facilities for which greater clarity regarding its Generator Interconnection Facilities would ensure no reliability gap exists

12 requirements in FAC-003-1 - Transmission Vegetation Management should have their applicability expanded to include Generator Owners.

2 NERC Reliability Standards should have their applicability expanded to include Generator Operators to address general reliability gaps not attributable to their Generator Interconnection Facilities.

8 new Reliability Standard Requirements should be added to ensure the responsibilities for owning and operating the Generator Interconnection Facility are clear, and to address certain requirements that should apply to all generators regardless of interconnection configuration.

New NERC Glossary definitions are needed for Generator Interconnection Facility and Generator Interconnection Operational Interface, as well as modifications to Vegetation Inspection, Right-of-Way, Generator Owner, Generator Operator, and Transmission

Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR.)

Refer to Final Report of the Ad hoc Group for Generator Requirements at the Transmission Interface.

Revisions to the latest versions of the following standards are included in the report and redline standard changes are included to accompany this SAR:

BAL-005

CIP-002

EOP-001, -003, -004, -008

FAC-001, -003, -008, -009

IRO-005

MOD-010, -012

PER-001, -002

PRC-001, -004, -005

TOP-001, -002, -003, -004, -008

VAR-001, -002

Reliability Functions

The Standard will Apply to the Following Functions *(Check box for each one that applies.)*		
☐	Reliability Assurer	Monitors and evaluates the activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the bulk power system within a Reliability Assurer Area and adjacent areas.
☐	Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.
☐	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time.
☐	Interchange Authority	Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas.
☐	Planning Coordinator	Assesses the longer-term reliability of its Planning Coordinator Area.
☐	Resource Planner	Develops a >one year plan for the resource adequacy of its specific loads within its portion of the Planning Coordinator's Area.
☒	Transmission Owner	Owns and maintains transmission facilities.
☒	Transmission Operator	Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.
☐	Transmission Planner	Develops a >one year plan for the reliability of the interconnected Bulk Electric System within the Transmission Planner Area.
☐	Transmission Service Provider	Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff).
☐	Distribution Provider	Delivers electrical energy to the End-use customer.
☒	Generator Owner	Owns and maintains generation facilities.
☒	Generator Operator	Operates generation unit(s) to provide real and reactive power.
☐	Purchasing-Selling Entity	Purchases or sells energy, capacity, and necessary reliability-related services as required.
☐	Load-Serving Entity	Secures energy and transmission service (and reliability-related services) to serve the End-use Customer.

Reliability and Market Interface Principles

Applicable Reliability Principles *(Check box for all that apply.)*	
☒	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
☐	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
☒	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
☒	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
☒	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
☒	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
☐	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
☐	8. Bulk power systems shall be protected from malicious physical or cyber attacks.
Does the proposed Standard comply with all of the following Market Interface Principles? *(Select 'yes' or 'no' from the drop-down box.)*	
1. A reliability standard shall not give any market participant an unfair competitive advantage. Yes	
2. A reliability standard shall neither mandate nor prohibit any specific market structure. Yes	
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard. Yes	
4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes	

Related Standards

Standard No.	Explanation

Related SARs

SAR ID	Explanation

Regional Variances

Region	Explanation
ERCOT	
FRCC	
MRO	
NPCC	
SERC	
RFC	
SPP	
WECC	