Unofficial Comment Form

Project 2023-05 Modifications to FAC-001 and FAC-002

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project** **2023-05 Modifications to FAC-001 and FAC-002** by **8 p.m. Eastern, Thursday, September 7, 2023.
m. Eastern, Thursday, August 20, 2015**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2023-05-Modifications-to-FAC-001-and-FAC-002.aspx). If you have questions, contact Senior Standards Developer Ben Wu (via email), or at 470-542-6882.

## Background Information

The NERC System Performance Impacts of Distributed Energy Resources Work Group (SPIDERWG) evaluated the current body of NERC Reliability Standards and the requirements within those standards for distributed energy resource (DER) applicability and effectiveness with increasing penetrations of DER. This review is housed in the SPIDERWG *White Paper: NERC Reliability Standards Review*.[[1]](#footnote-1) The review took place between the years 2018 and 2022, culminating in a handful of SARs which included the SARs for FAC-001-4 and FAC-002-4. Both of these standards were identified as needing refinement, such that the reliability at the transmission to distribution interface (T-D interface) is maintained.

The RSTC endorsed the SARs at its March 22, 2023 meeting.[[2]](#footnote-2)

## Questions

1. Do you agree with the proposed scope as described in the Project 2023-05 SARs? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

[ ]  Yes

[ ]  No

Comments:

1. Provide any additional comments for the standard drafting team to consider, if desired.

Comments:

1. Available here: <https://www.nerc.com/comm/RSTC_Reliability_Guidelines/Whitepaper_SPIDERWG_Standards_Review.pdf#:~:text=SPIDERWG%20found%20that%20it%20would%20be%20beneficial%20to,e.g.%2C%20National%20Association%20of%20Regulatory%20Utility%20Commissioners%20%28NARUC%29>. [↑](#footnote-ref-1)
2. <https://www.nerc.com/comm/RSTC/AgendaHighlightsandMinutes/RSTC_Meeting_Materials_Package_March_22_2023.pdf> [↑](#footnote-ref-2)