Project 2010-02 – Connecting New Facilities to the Grid

Unofficial Comment Form

**Instructions**

Please **DO NOT** use this form for commenting.  Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=520bab55c8294cdbbedee4980df69635) to submit comments on the proposed revisions to FAC-001-1 and FAC-002-1.  Comments must be submitted by **May 15, 2014.** If you have questions please contact Standards Developer Mallory Huggins at mallory.huggins@nerc.net or by telephone at 202-644-8062.

Comment Form

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| Individual Commenter Information(Complete this page for comments from one organization or individual.) |
| Name:       |
| Organization:       |
| Telephone:       |
| E-mail:       |
| NERC Region (check all Regions in which your company operates) | Registered Ballot Body Segment (check all industry segments in which your company is registered) |
| [ ]  ERCOT[ ]  FRCC[ ]  MRO[ ]  NPCC[ ]  RFC[ ]  SERC[ ]  SPP[ ]  WECC[ ]  NA – Not Applicable | [ ]  | 1 — Transmission Owners |
|  | [ ]  | 2 — RTOs and ISOs |
|  | [ ]  | 3 — Load-serving Entities |
|  | [ ]  | 4 — Transmission-dependent Utilities |
|  | [ ]  | 5 — Electric Generators |
|  | [ ]  | 6 — Electricity Brokers, Aggregators, and Marketers |
|  | [ ]  | 7 — Large Electricity End Users |
|  | [ ]  | 8 — Small Electricity End Users |
|  | [ ]  | 9 — Federal, State, Provincial Regulatory or other Government Entities |
|  | [ ]  | 10 — Regional Reliability Organizations and Regional Entities |
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| Group Comments (Complete this page if comments are from a group.)Group Name:      Lead Contact:      Contact Organization:       Contact Segment:       Contact Telephone:      Contact E-mail:       |

| **Additional Member Name** | **Additional Member Organization** | **Region[[1]](#footnote-1)** | **Segment1** |
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Background Information

Project 2010-02 Connecting New Facilities to the Grid is implementing the recommendations that the FAC Five-Year Review Team (FYRT) made with respect to FAC-001-1 and FAC-002-1. A Standard Authorization Request outlining the proposed changes to FAC-001-1 and FAC-002-1 was posted for an informal comment period from December 18, 2014 through January 17, 2014, and a standard drafting team was assigned by the Standards Committee on February 12, 2014.

In line with the recommendations of the FYRT, the SDT has proposed changes 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. The SDT has also addressed SAR comments, Order 693 directives related to FAC-002-0, the recommendations of the Independent Experts Review Panel, Phase 1 Paragraph 81 suggestions, and the recommendations of the Integration of Variable Generation Task Force.

You do not have to answer all questions. Enter all comments in simple text format. Insert a check mark in the appropriate boxes by double-clicking the gray areas.

Questions

1. The SDT has proposed the following key revisions to FAC-001-2:
* Revised the title and purpose to reflect the language in the requirements.
* Removed the reference in R1 to: “…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, R1.2.
* Moved all of the subparts in R3, except for R3.1 and R3.2, and to the Guidelines and Technical Basis section. The SDT wants to provide entities with the flexibility to determine the Facility interconnection requirements that are technically appropriate for their respective Facilities. Including them as subparts of R3 was deemed too prescriptive, as frequently some items in the list will not apply to all applicable entities – and some applicable entities will have requirements that expand upon the list. The Guidelines should be used as a starting point for each Transmission Owner and applicable Generator Owner to consider in the development of Facility interconnection requirements.
* Modified R3 to ensure that the impact on third parties is appropriately addressed.
* Retired R4.
* Updated all compliance elements: updated the Measures to add examples of acceptable evidence; modified the VSLs for conformance with the updated requirement language; modified the VRFs for conformance with NERC’s VRF guidelines; added Time Horizons to each requirement.

Do you agree with these revisions?

[ ]  Yes

[ ]  No

Comments:

1. The SDT has proposed the following key revisions to FAC-002:
* Revised the title and purpose to reflect the language in the requirements.
* Rearranged the order of Functional Entities in the Applicability section to reflect the order in the Functional Model; changed “Planning Authority” in the applicability section to “Planning Coordinator” to reflect the Functional Model, as well as the recently revised TPL-001-4; added “Applicable Generator Owner” to the Applicability section so that R4 does not require a reference to FAC-001
* Separated R1 into four requirements to add clarity and better distinguish the actions required of the applicable entities.
* Revised the subparts of R1 to remove elements that are more appropriate for Measures.
* Modified R1.1 to ensure that the impact on third parties is appropriately addressed.
* Modified R1.4 to remove the reference to the TPL Reliability Standards to avoid redundancy with the R1.2 reference to “all NERC Reliability Standards.”
* Updated all compliance elements: added Measures, VRFs, and Time Horizons to each requirement; modified the VSLs for conformance with the updated requirement language

Do you agree with these revisions?

[ ]  Yes

[ ]  No

Comments:

1. Do you agree with the timeline for implementation as proposed in the Implementation Plan?

[ ]  Yes

[ ]  No

Comments:

1. If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page. [↑](#footnote-ref-1)