

Standards Announcement

Project 2010-07

Generator Requirements at the Transmission Interface

Non-Binding Poll January 4 – 13, 2012

[Now Available](#)

Over the last year, the Project 2010-07 Generator Requirements at the Transmission Interface SDT has proposed and vetted changes to FAC-001-1, FAC-003-X, FAC-003-3, and PRC-004-2.1. All four standards were approved by their respective ballot pools in recirculation ballots that ended on December 23, 2011. FAC-001, FAC-003-3, and PRC-004-2.1a (which includes the interpretation from PRC-004-2a) will be presented to the NERC Board of Trustees for approval in February 2012.

From January 4-13, 2012, the SDT will be conducting a non-binding poll of the VSLs and VRFs that were substantively revised. FAC-003-X's and PRC-004-2.1a's VSLs and VRFs were not revised at all and FAC-003-3's VSLs and VRFs were only edited to change the responsible entity in the VSLs, so only FAC-001-1's VSLs and VRFs are being posted for the non-binding poll.

Detail on Updates to VSLs and VRFs for FAC-001-1, FAC-003-X, FAC-003-3, and PRC-004-2.1a

Because it was a Version 0 standard, FAC-001-0 did not initially have VSLs or VRFs assigned to it. The VSLs for FAC-001-1 were transferred from the VSLs filed by NERC staff on March 21, 2011 (in [Supplemental Information to the NERC Compliance Filing in Response to the Order on Violation Severity Levels Proposed by the ERO](#)). The VRFs for FAC-001-1 were transferred into the standard from NERC's [VRF Matrix](#) – which includes VRFs that have already been approved by FERC – to bring the format of the standard up to date. For existing Requirements R1 and R4 (applicable to Transmission Owners only), no substantive changes to VSLs or VRFs were made, although typographical errors in the VSLs for R1 was corrected. For new requirement R2 (applicable to Generator Owners only), the Project 2010-07 standard drafting team applied the comparable VRF from R1 and developed a set of VSLs according to NERC and FERC guidelines. For modified Requirement R3 (applicable to Transmission Owners and Generator Owners), no substantive changes to the VSLs or VRFs were made, although a typographical error in the VSLs for R3 was corrected and “Transmission Owner” was changed to “responsible entity.”

The proposed changes in FAC-003-3 serve only to make the standard applicable to qualifying Generator Owners, so no changes were proposed for the VRFs for FAC-003-3. The only modification proposed for the VSLs for FAC-003-3 was to change all references to “Transmission Owner” to “responsible entity.” The proposed change in PRC-004-2.1a Requirement R2 is a clarifying (errata) change that makes clear that generator interconnection Facilities are also part of Generator Owners' responsibility in the context of this standard. Thus, no changes were proposed for the VRFs or VSLs for PRC-004-2.1a.

Instructions for Casting an Opinion in the Non-binding Poll

Members of the ballot pool associated with this project may log in and submit their opinion for the non-binding polls from the following page: <https://standards.nerc.net/CurrentBallots.aspx>

Next Steps

FAC-001, FAC-003-3, and PRC-004-2.1a will be presented to the NERC Board of Trustees for adoption in February 2012, and information on the non-binding poll results will be provided to the Board for consideration in their decision.

Background

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 Facilities, commonly known as generator interconnection Facilities, that are considered by some entities to be transmission, these are most often sole-use Facilities that are not part of the integrated grid. As such, they 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 do affect the overall reliability of the BES. But 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 SDT'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. This can be accomplished by properly applying FAC-001, FAC-003, PRC-004, and later, PRC-005, to Generator Owners. Additional information is available on the [project page](#).

Standards Process

The [Standard Processes Manual](#) contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

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