

Standards Announcement

Project 2010-07 Generator Requirements at the Transmission Interface

Formal Comment Period Open March 9 – April 9, 2012

Successive Ballot Window Open March 30 – April 9, 2012

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The Generator Requirements at the Transmission Interface drafting team has posted limited revisions to the Applicability sections of FAC-003-X—Transmission Vegetation Management Program and FAC-003-3—Transmission Vegetation Management, along with implementation plans, for parallel formal 30-day comment periods and successive ballots.

Instructions for Commenting

Please use this [electronic form](#) to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at monica.benson@nerc.net. An off-line, unofficial copy of the comment form is posted on the [project page](#).

Special Instructions for Submitting Comments with a Ballot

Please note that comments submitted during the formal comment period and ballot for the standard all use the same electronic form, and it is NOT necessary for ballot pool members to submit more than one set of comments. The drafting team requests that all stakeholders (ballot pool members as well as other stakeholders) submit all comments through the electronic comment form.

Next Steps

Successive ballots of FAC-003-X and FAC-003-3 will begin on Friday, March 30, 2012 and will end at 8 p.m. Eastern on Monday, April 9, 2012.

Background

A Level 1 Appeal of FAC-003-3/FAC-003-X was received and reviewed by the Vice President of Standards and Training and then the Standards Committee's Executive Committee. They determined the appellant's claim to be valid in part, and determined that the modifications the SDT made to the applicability of FAC-003-3 and FAC-003-X prior to the recirculation ballot were substantive.

Consequently, the results of the recirculation ballots for FAC-003-3 and FAC-003-x have been declared void. The Standards Committee's Executive Committee remanded FAC-003-3 and FAC-003-x to the SDT with direction to consider the issues raised in the Exelon appeal and either:

- Modify the language added following the initial ballot and then post the standard for a successive ballot, or
- Remove the language added following the initial ballot and go directly to recirculation ballot.

A copy of the Executive Committee meeting minutes has been posted on the [project page](#) for information.

The SDT reviewed FAC-003-X and FAC-003-3 again and modified them slightly. More detail is available in the background section of the posted Unofficial Comment form, as well as in the updated [Considerations of Comments](#) report.

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 radial 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 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 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 that properly applying FAC-003 to Generator Owners as proposed in the redline standards posted for comment supports this objective.

Before reviewing the standards, the drafting team encourages all stakeholders to read the technical justification resource document it has provided to describe its rationale and its work thus far.

Additional information is available on the [project page](#).

Standards Development 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. For more information or assistance, please contact Monica Benson at monica.benson@nerc.net.

*For more information or assistance, please contact Monica Benson,
Standards Process Administrator, at monica.benson@nerc.net or at 404-446-2560.*

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