

# Standards Announcement

## Project 2010-07 Generator Requirements at the Transmission Interface

Four Ballot Windows Now Open Through 8 p.m. Eastern on Friday, November 18, 2011

### Now Available

An initial ballot of each of the following standards is open through 8 p.m. Eastern on Friday, November 18, 2011. Note that the ballots are limited to the few modifications made to these standards to ensure that there is a functional entity responsible for requirements associated with the transmission line connecting the generator step up transformer to the transmission system (generator interconnection Facility).

- FAC-001-1 – Facility Connection Requirements
- Two versions of FAC-003 – Transmission Vegetation Management (FAC-003-3 and FAC-003-X). Note that FAC-003-X shows changes to FAC-003-1, while FAC-003-3 shows changes to FAC-003-2 developed by the Project 2007-07 drafting team. **FAC-003-2 was adopted by the NERC Board on November 3, and a revised version of FAC-003-3 showing the Project 2010-07 drafting team's changes against the Board's version has now been posted.**
- PRC-004-2.1 – Analysis and Mitigation of Transmission and Generation Protection System Misoperations

### **IMPORTANT: Updates on Posted Standards**

Last week, while the Project 2010-07 standards were posted for comment, NERC's Board of Trustees adopted FAC-003-2 – Transmission Vegetation Management (developed under Project 2007-07 Vegetation Management). Based on this approval, NERC staff will file FAC-003-2 with the applicable regulatory authorities. The Project 2010-07 SDT will move forward with ballots for both FAC-003-3 (proposed changes to the BOT-adopted FAC-003-2) and FAC-003-X (proposed changes to the FERC-approved FAC-003-1) with the intention of eventually only filing FAC-003-3. The SDT has elected to carry FAC-003-X through to ballot because if FAC-003-2 and FAC-003-3 are not approved by FERC, the SDT wants to be ready to file FAC-003-X to ensure that there is a functional entity responsible for managing vegetation on the piece of line commonly known as the generator interconnection Facility.

Additionally, when the NERC Board of Trustees adopted FAC-003-2 –Transmission Vegetation Management last week, it approved the standard with NERC staff-proposed VSLs rather than the Project 2007-07 SDT-developed VSLs that were originally posted with both FAC-003-2 and FAC-003-3. The posted versions of Project 2010-07's FAC-003-3 now include the FAC-003-2 VSLs proposed by NERC

staff, since they are the set that was approved by the NERC Board of Trustees. Note that the Project 2010-07 SDT made no substantive changes to any version of the FAC-003-2 VSLs; the SDT simply changed “Transmission Owner” to “responsible entity.” A text box has also been added to the VSL section of FAC-003-3 for further clarity.

### **Instructions for Balloting**

Members of the ballot pools associated with this project may log in and submit their votes for the standards from the following page: <https://standards.nerc.net/CurrentBallots.aspx>

### **Instructions for Commenting**

A formal comment period is open through **8 p.m. Eastern on Friday, November 18, 2011**. 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](mailto: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 the ballots for the standards 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**

The drafting team will consider all comments submitted during the formal comment period and ballots to determine whether to make additional revisions to the standards.

### **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 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 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 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. This can be accomplished by properly applying FAC-001, FAC-003, and PRC-004 to Generator Owners as proposed in the redline standards posted for comment.

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](mailto:monica.benson@nerc.net).

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

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