

Consideration of Comments on Facility Ratings Expansion — (Project 2009-06)

The Facility Ratings Drafting Team thanks all commenters who submitted comments on the First Posting of FAC-008-3, Facility Ratings (Project 2009-06). This standard was posted for a 45-day public comment period from March 17, 2011 through May 2, 2011 and an initial ballot of the standard and a non-binding poll of the associated Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) were conducted from April 21 through May 2, 2011.

Stakeholders were asked to provide feedback on the standard through a special electronic comment form and members of the ballot pool provided comments either through the comment form or with their ballots or with the non-binding poll. There were 45 sets of comments submitted with a comment form; 48 balloters submitted comments either with a comment form or with a ballot. This report includes all comments submitted with a comment form or with a ballot or with the non-binding poll of the VRFs and VSLs.

http://www.nerc.com/filez/standards/Project_2009-06_Facility_Ratings.html

Summary Consideration of Comments:

Many commenters had concerns with the language of the new Requirement R8 and its parts and subparts and asked for additional clarity. The three main concerns were

- 1) clarify which entities can request the information identified in Requirement R8,
- 2) clarify that the information requested is limited to thermal ratings, and
- 3) clarify terms including "generator deliverability", "major city," and "load pocket".

The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket.

With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities under their authority are impacted. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. This will provide better guidance with respect to "generator deliverability," "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. The FRSDT chose this specific language because the entities listed as requesting the information do not necessarily own Facilities.

- The Reliability Coordinator does not necessarily own assets, but has a reliability authority over certain Facilities.
- The Planning Coordinator or Transmission Planner do not own assets but have planning authority over a set of Facilities.
- The Transmission Operator does not necessarily own assets but has operational authority over those Facilities.
- The Transmission Owner does own its Facilities and has authority over those Facilities.

The FRSDT believes that the revised language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement.

The FRSDT also modified R8, Part 8.2.2 to change the term, "Equipment Rating" to "Thermal Rating" for clarity in support of stakeholder comments.

The proposed clarified Requirement R8 is shown below:

Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that ~~limits the use of Facilities under the requester's authority by causing the requester has identified as having~~ any of the following: 1) A an Interconnection Reliability Operating Limit, 2) A limitation ~~ing of~~ Total Transfer Capability, 3) An impediment ~~ng~~ to generator deliverability, or 4) An impediment to ~~impeding~~ service to a major ~~city or~~ load center ~~pocket~~:

8.2.1 Identity of the existing next most limiting equipment of the Facility

8.2.2 The ~~Equipment~~ Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

Most commenters agreed with the proposed VRFs, VSLs and Time Horizons. Some commenters had concerns with the use of percentages in the VSLs. The VSLs allow for the varying scenarios of non-compliance with the requirement. Since a requester may ask for multiple Facility Ratings, the requested entity may not provide all of the information (i.e. only half or 50% or the requested information). Likewise, an entity may be late in providing the information. The VSLs meet the guidelines for this type of requirement. Please keep in mind that VSLs are only applied after a violation of the requirement is found. Some commenters suggested that the VRF for R8 should be lower. The VRF for R8 matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements have the same VRF.

Other commenters suggested that the Time Horizon for R8 should be Long-term Planning. The usage of the information obtained under R8 is envisioned to be the same as that obtained under R7. The Time horizons are the same for both requirements.

Minor revisions were made to the VSLs for R7 and R8 as follows:

1. The first VSL under the Lower category needs the words "and including" inserted prior to the "15 calendar days" language. The last part of the sentence should state "but missed meeting the schedules by up to and including 15 calendar days. This extra language would further clarify that if an entity reported its Facility Ratings on the 15th day, they would fall under the "Lower" VSL.

2. For the VSLs which incorporate percentages, the VSL percentages are not inclusive. The words "or equal to" should be incorporated into such VSLs. For

example, the second VSL under the Lower category should state “The responsible entity provided less than 100%, but not less than or equal to 95%...” This type of change should be incorporated in all four of the VSL categories.

The majority of commenters agree with the Measure M8. A couple of commenters had suggestions for including language that limits the scope to requested data and other specific language. The FRSDT believes that the phrase “in accordance with Requirement R8” contained in M8 is sufficient language to tie the measure to the requirement and provide the linkage suggested by the commenters.

The majority of commenters agree with the implementation plan. One commenter suggested that NERC provide guidance on how to handle certain specific situations. The FRSDT maintains that the requirements are written to allow entities flexibility in determining their Facility Ratings Methodology and the subsequent Facility Ratings. The requirements allow for entities to handle both common and unique situations without being prescriptive. Another commenter suggested changing the effective date to match the end date of a NERC Alert relating to FAC-008. The FRSDT believes that the requirements under FAC-008-3 are not onerous and that entities are performing the work today that will be required under FAC-008-3.

Several commenters requested clarification or edits to the standard which are outside of the scope of the Supplemental SAR. These comments will be placed in the NERC Issues Database for consideration on the next revision to the standard.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedures: <http://www.nerc.com/standards/newstandardsprocess.html>.

Index to Questions, Comments, and Responses

1. Do you agree that the proposed Requirement R8 addresses the FERC Directive from Order 693, Paragraph 756? If not, please explain why not and if possible, provide an alternative that would be acceptable to you. 22

2. Do you agree with the proposed Violation Risk Factor, Time Horizon and Violation Severity Levels for requirement R8? If not, please explain why not and if possible, provide an alternative that would be acceptable to you. 78

3. Do you agree with the proposed Measure M8? If not, please explain why not and if possible, provide an alternative that would be acceptable to you. 89

4. Do you agree with the proposed Implementation Plan for FAC-008-3, Facility Ratings? If not, please explain why not and if possible, provide an alternative that would be acceptable to you. 94

5. If you have any other comments related to the FERC directive (paragraphs 756 and 771) and this Supplemental SAR that you have not already provided in response to the questions above, please provide them here. 98

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, 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, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Jesus Sammy Alcaraz	Imperial Irrigation District	X		X	X						
Additional Member Additional Organization Region Segment Selection													
1.	David Barajas	IID	WECC	1, 3, 4									
2.	Group	Guy Zito	Northeast Power Coordinating Council										X
Additional Member Additional Organization Region Segment Selection													
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10									
2.	Gregory Campoli	New York Independent System Operator	NPCC	2									
3.	Kurtis Chong	Independent Electricity System Operator	NPCC	2									
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1									
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1									
6.	Gerry Dunbar	Northeast Power Coordinating Council		10									
7.	Brian Evans-Mongeon	Utility Services	NPCC	8									
8.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5									
9.	Brian L. Gooder	Ontario Power Generation Incorporated	NPCC	5									
10.	Kathleen Goodman	ISO - New England	NPCC	2									
11.	David Kiguel	Hydro One Networks Inc.	NPCC	1									

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Group/Individual	Commenter	Organization	Registered Ballot Body Segment																	
			1	2	3	4	5	6	7	8	9	10								
12. Michael R. Lombardi	Northeast Utilities	NPCC	1																	
13. Randy MacDonald	New Brunswick Power Transmission	NPCC	1																	
14. Bruce Metruck	New York Power Authority	NPCC	6																	
15. Chantel Haswell	FPL Group, Inc.	NPCC	5																	
16. Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																	
17. Robert Pellegrini	The United Illuminating Company	NPCC	1																	
18. Saurabh Saksena	National Grid	NPCC	1																	
19. Michael Schiavone	National Grid	NPCC	1																	
20. Wayne Sipperly	New York Power Authority	NPCC	5																	
21. Donald Weaver	New Brunswick System Operator	NPCC	1																	
22. Ben Wu	Orange and Rockland Utilities	NPCC	1																	
23. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																	
24. Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																	
3.	Group	Louis Slade	Dominion	X		X		X	X											
Additional Member Additional Organization Region Segment Selection																				
1.	Connie Lowe	Electric Market Policy	SERC	5, 6																
2.	Mike Garton	Electric Market Policy	NPCC	5, 6																
3.	Michael Gildea	Electric Market Policy	NA - Not Applicable	5, 6																
4.	Michael Crowley	Electric Transmission	SERC	1, 3																
5.	Matt Woodzell	Fossil & Hydro	SERC	5																
6.	Jeff Bailey	Nuclear	MRO	5																
7.	Chip Humphrey	Fossil & Hydro	RFC	5																
4.	Group	Jonathan Hayes	SPP Reliability Standards Development																	
Additional Member Additional Organization Region Segment Selection																				
1.	John Allen	City Utilities of Springfield, MO	SPP	1, 4																
5.	Group	Steve Alexanderson	Pacific Northwest Small Public Power Utility Comment Group			X	X												X	

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
Additional Member		Additional Organization		Region Segment Selection									
1.	Dave Proebstel	Clallam County PUD No.1	WECC 3										
2.	Russell A. Noble	Cowlitz County PUD No. 1	WECC 3, 4, 5										
3.	Ronald Sporseen	Blachly-Lane Electric Cooperative	WECC 3										
4.	Ronald Sporseen	Central Electric Cooperative	WECC 3										
5.	Ronald Sporseen	Consumers Power	WECC 1, 3										
6.	Ronald Sporseen	Clearwater Power Company	WECC 3										
7.	Ronald Sporseen	Douglas Electric Cooperative	WECC 3										
8.	Ronald Sporseen	Fall River Rural Electric Cooperative	WECC 3										
9.	Ronald Sporseen	Northern Lights	WECC 3										
10.	Ronald Sporseen	Lane Electric Cooperative	WECC 3										
11.	Ronald Sporseen	Raft River Rural Electric Cooperative	WECC 3										
12.	Ronald Sporseen	Lost River Electric Cooperative	WECC 3										
13.	Ronald Sporseen	Salmon River Electric Cooperative	WECC 3										
14.	Ronald Sporseen	Umatilla Electric Cooperative	WECC 3										
15.	Ronald Sporseen	West Oregon Electric Cooperative	WECC 3										
16.	Ronald Sporseen	Pacific Northwest Generating Cooperative	WECC 3, 4, 8										
17.	Ronald Sporseen	Power Resources Cooperative	WECC 5										
18.	Ronald Sporseen	Lincoln Electric Cooperative	WECC 3										
19.	Ronald Sporseen	Coos-Curry Electric Cooperative	WECC 3										
6.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X				
Additional Member		Additional Organization		Region Segment Selection									
1.	Richard Becker	BPA, Transmission, Substation Engineering	WECC 1										
7.	Group	Bill Shultz	Southern Company Generation (SCG) Technical Services					X					
Additional Member		Additional Organization		Region Segment Selection									
1.	Bill Shultz	Southern Company Generation	SERC 5										
2.	Terry Crawley	Southern Company Generation	SERC 5										

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
8.	Group	Mikhail Flakovich	Public Service Enterprise Group	X		X		X	X				
Additional Member Additional Organization Region Segment Selection													
1.	Peter Dolan	PSEG Power	ERCOT	5, 6									
2.	Mikhail Falkovich	PSEG Power	ERCOT	5, 6									
3.	Ken Brown	PSE&G	RFC	1, 3									
4.	Clint Bogan	PESG Power	NPCC	5, 6									
5.	Scott Slickers	PSEG Power	RFC	5, 6									
9.	Group	Bruce Wertz	NERC Standards Review Subcommittee					X					
Additional Member Additional Organization Region Segment Selection													
1.	Tim Soles	Occidental Power Services, Inc.	ERCOT	5									
10.	Group	Marie Knox	MISO Standards Collaborators		X								
Additional Member Additional Organization Region Segment Selection													
1.	Sam Ciccone	First Energy	RFC	1, 3, 4, 5, 6									
2.	Doug Hohlbaugh	First Energy	RFC	1, 3, 4, 5, 6									
3.	Jim Cyrulewski	JDRJC Associates	RFC	8									
11.	Group	Greg Campoli	IRC Standards Review Committee		X								
Additional Member Additional Organization Region Segment Selection													
1.	Patrick Brown	PJM	RFC	2									
2.	Steve Myers	ERCOT	ERCOT	2									
3.	Charles Yeung	SPP	SPP	2									
4.	Matt Goldberg	ISO-NE	NPCC	2									
5.	Ben Li	IESO	NPCC	2									
6.	Terry Bilke	MISO	MRO	2									
7.	Bill Phillips	MISO	MRO	2									
8.	Mark Westendorf	MISO	MRO	2									
9.	Mark Thompson	AESO	WECC	2									

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			1	2	3	4	5	6	7	8	9	10								
10. Al DiCaprio	PJM	RFC	2																	
11. Kathleen Goodman	ISO-NE	NPCC	2																	
12. Greg Van Pelt	CAISO	WECC	2																	
13. Don Weaver	NBSO	NPCC	2																	
14. Mike Falvo	IESO	NPCC	2																	
12.	Individual	Sandra Shaffer	PacifiCorp	X		X		X												
13.	Individual	JT Wood	Southern Company Transmission	X		X														
14.	Individual	Mike Laney	Luminant Power					X												
15.	Individual	Cynthia Oder	SRP	X		X		X	X											
16.	Individual	Jonathan Appelbaum	United Illuminating Company	X																
17.	Individual	Nathaniel Larson	New Harquahala Generating Co.	X				X												
18.	Individual	Dan Roethemeyer	Dynegy Inc.					X												
19.	Individual	Thad Ness	American Electric Power	X		X		X	X											
20.	Individual	Robert Casey	Georgia Transmission Corporation	X																
21.	Individual	Jack Stamper	Clark Public Utilities	X																
22.	Individual	John Bee	Exelon	X		X		X												
23.	Individual	Edvina Uzunovic	The Valley Group, a Nexans company	X	X															
24.	Individual	Ed Davis	Entergy Services, Inc	X		X		X	X											

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
25.	Individual	Kirit Shah	Ameren	X		X		X	X				
26.	Individual	David Thorne	Pepco Holdings Inc	X		X							
27.	Individual	Joe Petaski	Manitoba Hydro	X		X		X	X				
28.	Individual	Patricia Robertson	BC Hydro and Power Authority	X	X	X		X					
29.	Individual	Andrew Pusztai	American Transmission Company, LLC	X									
30.	Individual	Brian Jacoby	BGE	X									
31.	Individual	Darrin Adams	East Kentucky Power Cooperative	X		X		X					
32.	Individual	Tony Kroskey	Brazos Electric Power Cooperative	X		X		X					
33.	Individual	Jim Keller	We Energies										
34.	Individual	Claudiu Cadar	GDS Associates	X									
35.	Individual	Bill Middaugh	Tri-State G&T	X									
36.	Individual	Rex Roehl	Indeck Energy Services					X					
37.	Individual	Michael Schiavone	Niagara Mohawk (National Grid Company)			X							
38.	Individual	Saurabh Saksena	National Grid	X		X							
39.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	X		X		X	X				
40.	Individual	Dennis Sismaet	Seattle City Light						X				

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
41.	Individual	Jason L. Marshall	ACES Power Marketing						X				
42.	Individual	Armin Klusman	CenterPoint Energy	X									
43.	Individual	Terri Pyle	Oklahoma Municipal Power Authority				X						
44.	Individual	B. Vijayraghavan	Pacific Gas & electric Company	X									
45.	Individual	Alice Ireland	Xcel Energy	X		X		X	X				

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The following balloters submitted comments either with a comment form or with their ballot:

	Balloter	Company	Industry Segment
1.	Edward P. Cox	AEP Marketing	6
2.	Richard J. Mandes	Alabama Power Company	3
3.	Kirit S. Shah	Ameren Services	1
4.	Paul B. Johnson	American Electric Power	1
5.	Andrew Z Puztai	American Transmission Company, LLC	1
6.	John Bussman	Associated Electric Cooperative, Inc.	1
7.	James Armke	Austin Energy	1
8.	Gregory S Miller	Baltimore Gas & Electric Company	1
9.	Venkataramakrishnan Vinnakota	BC Hydro	2
10.	Patricia Robertson	BC Hydro and Power Authority	1
11.	Pat G. Harrington	BC Hydro and Power Authority	3
12.	Clement Ma	BC Hydro and Power Authority	5
13.	Donald S. Watkins	Bonneville Power Administration	1
14.	Rebecca Berdahl	Bonneville Power Administration	3
15.	Francis J. Halpin	Bonneville Power Administration	5

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	Balloter	Company	Industry Segment
16.	Dave Markham	Central Electric Cooperative, Inc. (Redmond, Oregon)	3
17.	Steve Alexanderson	Central Lincoln PUD	3
18.	Shamus J Gamache	Central Lincoln PUD	4
19.	Kevin L Howes	Central Maine Power Company	1
20.	John Yale	Chelan County Public Utility District #1	5
21.	Andrew Gallo	City of Austin dba Austin Energy	3
22.	Reza Ebrahimian	City of Austin dba Austin Energy	4
23.	Lisa L Martin	City of Austin dba Austin Energy	6
24.	Linda R. Jacobson	City of Farmington	3
25.	Jeff Mead	City of Grand Island	5
26.	Bill Hughes	City of Redding	3
27.	Nicholas Zettel	City of Redding	4
28.	Paul A Cummings	City of Redding	5
29.	Marvin Briggs	City of Redding	6
30.	Chang G Choi	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	1
31.	Max Emrick	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	5

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	Balloter	Company	Industry Segment
32.	Michelle A Corley	Cleco Corporation	3
33.	Stephanie Huffman	Cleco Power	5
34.	Robert Hirschak	Cleco Power LLC	6
35.	Paul Morland	Colorado Springs Utilities	1
36.	Lisa Cleary	Colorado Springs Utilities	3
37.	Jennifer Eckels	Colorado Springs Utilities	5
38.	Lisa C Rosintoski	Colorado Springs Utilities	6
39.	Christopher L de Graffenried	Consolidated Edison Co. of New York	1
40.	Peter T Yost	Consolidated Edison Co. of New York	3
41.	Wilket (Jack) Ng	Consolidated Edison Co. of New York	5
42.	Nickesha P Carrol	Consolidated Edison Co. of New York	6
43.	Carolyn Ingersoll	Constellation Energy	3
44.	Brenda Powell	Constellation Energy Commodities Group	6
45.	Amir Y Hammad	Constellation Power Source Generation, Inc.	5
46.	James B Lewis	Consumers Energy	5
47.	Roman Gillen	Consumers Power Inc.	3
48.	Roger Meader	Coos-Curry Electric Cooperative, Inc	3

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	Balloter	Company	Industry Segment
49.	Russell A Noble	Cowlitz County PUD	3
50.	Rick Syring	Cowlitz County PUD	4
51.	Bob Essex	Cowlitz County PUD	5
52.	Dave Sabala	Douglas Electric Cooperative	3
53.	Sally Witt	East Kentucky Power Coop.	3
54.	Joel T Plessinger	Entergy	3
55.	Edward J Davis	Entergy Services, Inc.	1
56.	Terri F Benoit	Entergy Services, Inc.	6
57.	Claudiu Cadar	GDS Associates, Inc.	1
58.	Anthony L Wilson	Georgia Power Company	3
59.	Harold Taylor, II	Georgia Transmission Corporation	1
60.	Robert Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1
61.	Ajay Garg	Hydro One Networks, Inc.	1
62.	David L Kiguel	Hydro One Networks, Inc.	3
63.	Bernard Pelletier	Hydro-Quebec TransEnergie	1
64.	Ronald D. Schellberg	Idaho Power Company	1
65.	Tino Zaragoza	Imperial Irrigation District	1

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	Balloter	Company	Industry Segment
66.	Jesus S. Alcaraz	Imperial Irrigation District	3
67.	Diana U Torres	Imperial Irrigation District	4
68.	Kim Warren	Independent Electricity System Operator	2
69.	Kathleen Goodman	ISO New England, Inc.	2
70.	John J Babik	JEA	5
71.	Michael Henry	Lincoln Electric Cooperative, Inc.	3
72.	Charles A. Freibert	Louisville Gas and Electric Co.	3
73.	Tom Foreman	Lower Colorado River Authority	5
74.	Mike Laney	Luminant Generation Company LLC	5
75.	Joseph G. DePoorter	Madison Gas and Electric Co.	4
76.	Joe D Petaski	Manitoba Hydro	1
77.	Greg C. Parent	Manitoba Hydro	3
78.	S N Fernando	Manitoba Hydro	5
79.	Daniel Prowse	Manitoba Hydro	6
80.	Danny Dees	MEAG Power	1
81.	Steven Grego	MEAG Power	5
82.	Terry Harbour	MidAmerican Energy Co.	1

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	Balloter	Company	Industry Segment
83.	Marie Knox	Midwest ISO, Inc.	2
84.	Don Horsley	Mississippi Power	3
85.	Spencer Tacke	Modesto Irrigation District	4
86.	Steven M. Jackson	Municipal Electric Authority of Georgia	3
87.	Tim Reed	Muscatine Power & Water	1
88.	John S Bos	Muscatine Power & Water	3
89.	Saurabh Saksena	National Grid	1
90.	Randy MacDonald	New Brunswick Power Transmission Corporation	1
91.	Arnold J. Schuff	New York Power Authority	1
92.	Gerald Mannarino	New York Power Authority	5
93.	William Palazzo	New York Power Authority	6
94.	Raymond P Kinney	New York State Electric & Gas Corp.	1
95.	Guy V. Zito	Northeast Power Coordinating Council, Inc.	10
96.	Michelle DAntuono	Occidental Chemical	5
97.	Ray Ellis	Okanogan County Electric Cooperative, Inc.	3
98.	Terri Pyle	Oklahoma Municipal Power Authority	4
99.	Colin Anderson	Ontario Power Generation Inc.	5

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	Balloter	Company	Industry Segment
100.	Ballard Keith Mutters	Orlando Utilities Commission	3
101.	Richard Kinas	Orlando Utilities Commission	5
102.	Claston Augustus Sunanon	Orlando Utilities Commission	6
103.	John H Hagen	Pacific Gas and Electric Company	3
104.	Richard J. Padilla	Pacific Gas and Electric Company	5
105.	John C. Collins	Platte River Power Authority	1
106.	Terry L Baker	Platte River Power Authority	3
107.	Pete Ungerman	Platte River Power Authority	5
108.	Carol Ballantine	Platte River Power Authority	6
109.	David Thorne	Potomac Electric Power Co.	1
110.	Kenneth D. Brown	Public Service Electric and Gas Co.	1
111.	Jeffrey Mueller	Public Service Electric and Gas Co.	3
112.	Chad Bowman	Public Utility District No. 1 of Chelan County	1
113.	Hugh A. Owen	Public Utility District No. 1 of Chelan County	6
114.	John D. Martinsen	Public Utility District No. 1 of Snohomish County	4
115.	Greg Lange	Public Utility District No. 2 of Grant County	3

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	Balloter	Company	Industry Segment
116.	Heber Carpenter	Raft River Rural Electric Cooperative	3
117.	Anthony E Jablonski	ReliabilityFirst Corporation	10
118.	John C. Allen	Rochester Gas and Electric Corp.	1
119.	Tim Kelley	Sacramento Municipal Utility District	1
120.	James Leigh-Kendall	Sacramento Municipal Utility District	3
121.	Mike Ramirez	Sacramento Municipal Utility District	4
122.	Bethany Hunter	Sacramento Municipal Utility District	5
123.	Claire Warshaw	Sacramento Municipal Utility District	6
124.	Ken Dizes	Salmon River Electric Cooperative	3
125.	Robert Kondziolka	Salt River Project	1
126.	John T. Underhill	Salt River Project	3
127.	Glen Reeves	Salt River Project	5
128.	Pawel Krupa	Seattle City Light	1
129.	Dana Wheelock	Seattle City Light	3
130.	Hao Li	Seattle City Light	4
131.	Michael J. Haynes	Seattle City Light	5
132.	Dennis Sismaet	Seattle City Light	6

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	Balloter	Company	Industry Segment
133.	Carter B. Edge	SERC Reliability Corporation	10
134.	Rich Salgo	Sierra Pacific Power Co.	1
135.	Long T Duong	Snohomish County PUD No. 1	1
136.	Mark Oens	Snohomish County PUD No. 1	3
137.	William D Shultz	Southern Company Generation	5
138.	Robert A Schaffeld	Southern Company Services, Inc.	1
139.	Charles H Yeung	Southwest Power Pool	2
140.	Noman Lee Williams	Sunflower Electric Power Corporation	1
141.	Travis Metcalfe	Tacoma Public Utilities	3
142.	Keith Morisette	Tacoma Public Utilities	4
143.	Michael C Hill	Tacoma Public Utilities	6
144.	Larry Akens	Tennessee Valley Authority	1
145.	Ian S Grant	Tennessee Valley Authority	3
146.	David Thompson	Tennessee Valley Authority	5
147.	Marjorie S. Parsons	Tennessee Valley Authority	6
148.	Tracy Sliman	Tri-State G & T Association, Inc.	1
149.	John Tolo	Tucson Electric Power Co.	1

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	Balloter	Company	Industry Segment
150.	Melissa Kurtz	U.S. Army Corps of Engineers	5
151.	Martin Bauer P.E.	U.S. Bureau of Reclamation	5
152.	Steve Eldrige	Umatilla Electric Cooperative	3
153.	Jonathan Appelbaum	United Illuminating Co.	1
154.	Steven L. Rueckert	Western Electricity Coordinating Council	10
155.	Anthony Jankowski	Wisconsin Energy Corp.	4
156.	Gregory L Pieper	Xcel Energy, Inc.	1
157.	Michael Ibold	Xcel Energy, Inc.	3
158.	Roger C Zaklukiewicz		8

1. Do you agree that the proposed Requirement R8 addresses the FERC Directive from Order 693, Paragraph 756? If not, please explain why not and if possible, provide an alternative that would be acceptable to you.

Summary Consideration: Many commenters had concerns with the language of the new Requirement R8 and its parts and subparts. The three main concerns were 1) entities who could request the information, 2) limiting the information to thermal ratings and 3) terms like "major city" and "load pocket".

The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket.

With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. The FRSDT chose this specific language because the entities listed do not necessarily own Facilities. The Reliability Coordinator does not necessarily own assets, but has a reliability authority over certain Facilities. The Planning Coordinator or Transmission Planner do not own assets but have planning authority over a set of Facilities. The Transmission Operator does not necessarily own assets but has operational authority over those Facilities. The Transmission Owner does own its Facilities and has authority over those Facilities.

The FRSDT believes that the revised language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement.

The FRSDT also modified R8, Part 8.2.2 to change the term, "Equipment Rating" to "Thermal Rating" for clarity in support of stakeholder comments.

The proposed clarified Requirement R8 is shown below:

8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that ~~limits the use of Facilities under the requester's authority by causing the requester has identified as having any of the following:~~ 1) ~~A an~~ Interconnection Reliability Operating Limit, 2) ~~A limitation ing-~~ of Total Transfer Capability, 3) ~~An impediment ng~~ to generator deliverability, or 4) ~~An impediment to-impeding~~ service to a major ~~city or~~ load ~~center-pocket~~:

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8.2.1 Identity of the existing next most limiting equipment of the Facility

8.2.2 The ~~Equipment Thermal~~ Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

No other revisions were made to the standard except for minor Measure and VSL clarifications.

Organization	Yes or No ²	Question 1 Comment
Ontario Power Generation Inc. – Colin Anderson		<p>1. OPG disagrees with the requirement to provide "Limiting Equipment" information as specified in Requirement 8.1.2. It remains unclear as to what reliability purpose would be served by the provision of this information. Maintenance of this type of information would be onerous, and particularly in light of its questionable utility, OPG sees no need to undertake such work.</p> <p>2. For the same reasons listed above, Requirement 8.2 is completely unnecessary.</p> <p>3. All other elements of the standard that refer to either of the above Requirements need to be deleted or amended.</p>

Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The background material was provided with the posting of the standard. During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the “Emergency Rating” or “shorter term rating” as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour

² When this column is blank, it indicates a comment that was submitted with a ballot but not via the electronic comment form. Some commenters submitted duplicate comments with their ballot and via the electronic comment form; in this case, the Yes or No column is marked with their response in the electronic comment form.

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Organization	Yes or No ²	Question 1 Comment
rating or some other value.		
JEA – John J Babik		<p>8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits USE OF the Requester’s FacilitiES by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.1. Identity of the existing next most limiting equipment of the Facility</p> <p>8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words “Facilities under the Requester’s authority” rather than the commenter’s term “Requester’s Facilities”. The term “Requester’s Facilities” could be interpreted as having an ownership relationship. The SDT used the term “Facilities under the Requester’s authority” to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
Associated Electric Cooperative, Inc.		<p>AECI wants to thank the team for their efforts. However, the time period to respond is only 30 days. The current version (R5) allows for 45 days and AECI believes when an entity needs to perform research on a request that requires interaction with adjacent entities 60 days would be more appropriate.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for your comment. Requirement 5 has a 45 day provision for responding to comments on the technical review of your methodology or documentation. As envisioned, the information necessary to comply with R7 and R8 should be readily available and accessible by entities. The SDT believes that a 30 day response is adequate.</p>		
Constellation Energy – Carolyn Ingersoll		<p>Although CECD believes that the proposed edits to R8 satisfies the FERC Order related to facility ratings, there are vague terms that need to be clarified in order for the standard to be acceptable. As an example, the term “impeding generator deliverability” needs to be better defined so that GOs and GOPs can better prepare for any request on its next most limiting piece of equipment.</p>

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Organization	Yes or No ²	Question 1 Comment
Constellation Energy Commodities Group – Brenda Powell		Although Constellation Energy Commodities Group believes that the proposed edits to R8 satisfies the FERC Order related to facility ratings, there are vague terms that need to be clarified in order for the standard to be acceptable. As an example, the term “impeding generator deliverability” needs to be better defined so that GOs and GOPs can better prepare for any request on its next most limiting piece of equipment.
<p>Response: The FRSDT thanks you for your comment. The FRSDT received many comments concerning the proposed requirement and its intent. Many stakeholders believe that more clarity is necessary. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. While it may vary between different Planning Coordinators and/or Reliability Coordinators, the term “impeding generator deliverability” generally refers to the transmission facility, which is limiting the ability to deliver the generation output to the aggregate load. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities are impacted. The FRSDT believes that this language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
Constellation Power Source Generation, Inc. – Amir Y Hammad		Although Constellation Power Generation believes that the proposed edits to R8 satisfies the FERC Order related to facility ratings, there are vague terms that need to be clarified in order for the standard to be acceptable. As an example, the term “impeding generator deliverability” needs to be better defined so that GOs and GOPs can better prepare for any request on its next most limiting piece of equipment.
<p>Response: The FRSDT thanks you for your comment. The FRSDT received many comments concerning the proposed requirement and its intent. Many stakeholders believe that more clarity is necessary. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. While it may vary between different Planning Coordinators and/or Reliability Coordinators, the term “impeding generator deliverability” generally refers to the transmission facility, which is limiting the ability to deliver the generation output to the aggregate load. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities are impacted. The FRSDT believes that this language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement. Please see the proposed clarified Requirement R8 in the Summary</p>		

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Organization	Yes or No ²	Question 1 Comment
Consideration above.		
Northeast Power Coordinating Council, Inc. – Guy V. Zito		Although the intent of the FERC Directive was met and might have even been exceeded in the view of some, there is question on what constitutes "major city or load pocket" in the revised document. NPCC is hesitant to support this wording due to a lack of definition of these terms and how an entity would apply them. There could be inconsistencies and issues with the Requirement as written.
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
Consumers Energy – James B Lewis		As a Generator Owner, I believe the concept of "Thermal Rating" is quite poorly defined. This concept comes in in R8.2 as follows: "Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:" If a boiler has too much reflective ash on its waterwalls, this heat transfer (Thermal) issue may certainly limit "generator deliverability". Similar issues arise in poor thermal performance of a fouled condenser, a feedwater heater, an air preheater, a steam turbine, or a gas turbine. All these have some sort of "Thermal Rating" that impacts "generator deliverability". Thus, the proposed Standard grossly over-reaches.
<p>Response: The FRSDT thanks you for your comment. Requirement R8 is applicable to only the Generation Owners that are subject to Requirement R2. Requirement R2, requires Generator Owners that own transmission equipment (e.g. the local switchyard associated with a generating station) to provide comparable ratings and equipment information as a Transmission owner (as in Requirement R3). If a Generator Owner is not subject to Requirement R2, that same Generator Owner is not subject to Requirement R8.</p>		

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Organization	Yes or No ²	Question 1 Comment
Public Service Electric and Gas Co.- Kenneth D. Brown; Jeffrey Mueller		<p>Comment #1 PSEG suggests numbering the 4 scenarios in section 8.2, similar to how it was numbered in the FERC paragraph 756. Also, the FERC paragraph used the word “causing” but the standard used the word “having”. Therefore it would read as: “Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that the requester has identified as causing one of the following 1. An Interconnection Reliability Operating Limit (IROL); 2. A limitation of Total Transfer Capability,; 3. Impeding generator deliverability, or; 4. Impeding service to a major city or load pocket.”</p> <p>Comment #2: Would the requesting entity be allowed to ask for this data at each of the registered entity’s facilities at the same time, or would it only be one facility at a time?</p>
<p>Response: The FRSDT thanks you for your comment. #1 - The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, the SDT accepts the proposed change. The Requirement does not address the process of asking for these data; however, as noted by the commenter, information related to the next most limiting equipment is restricted to the subset of facilities defined in Requirement R8, Part 8.2.</p> <p>#2 – The requirement is written such that a requesting entity may ask for any and all relevant information during a single request provided that the Facilities meet the criteria in the requirement.</p>		
New York Power Authority – Gerald Mannarino		<p>Comments: Requirement 8.2. - Need to clarify what constitutes a major city or load pocket. Requirement 8.1.2. - Believe that this would be applicable to each individual Normal and Emergency rating thus required to be provided. Believe that the proposed revision has gone beyond the intent of the FERC Directive. Requirement 8.2.2. - should state “The equipment’s Thermal Rating”</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous</p>		

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Organization	Yes or No ²	Question 1 Comment
<p>interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
<p>Cowlitz County PUD Rick Syring Bob Essex</p>		<p>Cowlitz is concerned that auditors will subjectively require evidence of the second most limiting facility has been identified regardless of whether there has been a request for such information from the RC, PC, TP, TO, or TOP. This is not to imply that the standard needs further revision; however the SDT needs to document fully its intent.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT believes that Requirement R8, Part 8.2 is clear in that data needs to be for a subset of facilities if and when it is requested by a Reliability Coordinator, Planning Coordinator, Transmission Planner, Transmission Owner or Transmission Operator that has authority for the specific Facility.</p>		
<p>Cowlitz County PUD Russell A Noble</p>		<p>Cowlitz is concerned that auditors will subjectively require evidence of the second most limiting facility has been identified regardless of whether there has been a request for such information from the RC, PC, TP, TO, or TOP. This is not to imply that the standard needs further revision; however the SDT needs to document fully its intent that such information must only be made available on request of the RC, PC, TP, TO or TOP and not the auditor.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT believes that Requirement R8, Part 8.2 is clear in that data needs to be for a subset of facilities if and when it is requested by a Reliability Coordinator, Planning Coordinator, Transmission Planner, Transmission Owner or Transmission Operator that has authority for the specific Facility.</p>		
<p>Tucson Electric Power Co. John Tolo</p>		<p>Disagreement with R 8.2</p>
<p>Occidental Chemical Michelle DAntuono</p>		<p>Even though the language of the requirement exactly paraphrases FERC’s directive, it introduces ambiguity which likely does not meet their intent. For example, in R8.2 the term “major city or load pocket” will be interpreted dissimilarly by planners in different regions of the country. A clear distinction similar to the transmission terms “IROL” and “TTC” needs to be used instead. Secondly, there appears to be no minimum threshold set in R8.2 for a Facility “impeding generator deliverability”. Auditors can (and do) use their own judgment</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>when they come across indefinite phrases like this. Every minor generator augment will arguably require the establishment of secondary ratings on the corresponding BES interconnection Facility as this is written.</p>
<p>Response: The FRSDT thanks you for your comment.</p> <p>The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Requirement R8, Part 8.2 and its subparts only apply to transmission facilities that are owned by a Generator Owner.</p>		
<p>City of Farmington</p>		<p>FEUS appreciates the efforts of the drafting team. However, FEUS does not support the standard as currently drafted. FEUS recommends the drafting team define 'major cities' and 'load pockets.'</p> <p>In addition, clarify that the Transmission Owners and applicable Generation Owners only have to determine the amount and identity of the next-most limiting piece of equipment associated with the facility limit upon request. In other words, the next most limiting equipment and rating is not required to be determined on all facilities (readily available) - upon request, the TO or GO will have 30 days (or so) to determine and respond according. Finally, the next most limiting equipment should not be required if the most limiting equipment is the conductor.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to</p>		

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Organization	Yes or No ²	Question 1 Comment
<p>more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
<p>Cleco Power Michelle A Corley Stephanie Huffman; Robert Hirschak</p>		<p>Finally, in R7 & R8, the schedule should not be determined by the requesting entity. Replace "as scheduled by such requesting entities" with " within 30 calendar days of receipt of request."</p>
<p>Response: The FRSDT thanks you for your comment. Requirement R8, Part 8.2 limits delivery of such data to within 30 calendar days.</p>		
<p>Hydro One Networks, Inc. – David L Kiguel</p>		<p>Hydro One Networks Inc. is casting a Negative vote with the following comments. We thank the Drafting Team for trying to develop a compromise solution between the overwhelming view of the industry regarding the ratings of facilities when the most limiting equipment constraint is removed and the subsequent FERC clarification on the September 16, 2010 Order. However, the proposed solution needs further work.</p> <p>As written, Requirement 8.2 goes beyond what is mandated in the FERC Orders and clarifications. This requirement should be deleted altogether as it serves no reliability purpose within what NERC Reliability Standards purview is. In addition, the proposed Requirement 8.2 uses the terms "major city" and "load pocket" without further clarification. Not only these terms do not belong in a NERC Reliability Standard but are subject to interpretations that would make its usage potentially inconsistent by different entities.</p> <p>We believe that FERC's Orders would be addressed by deleting 8.2 and just modifying Requirement 8.1.2 to explicitly state that the identification of the most limiting equipment</p>

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Organization	Yes or No ²	Question 1 Comment
		applies to both Normal and Emergency ratings.
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above. Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is “under the Requester’s authority”, minimizing interpretation issues.</p> <p>The SDT believes the entire FAC 008-3 does not require any information beyond “Normal” and “Emergency” ratings as per Requirement R2, Part 2.4.2 and Requirement R3, Part 3.4.2.</p>		
Manitoba Hydro – Joe D Petaski; Greg C. Parent; S N Fernando; Daniel Prowse		<p>In Diagram 1 of the Unofficial Comment Form, it is obvious that if a transmission owner provides a continuous and a shorter term rating, the continuous rating of the facility is based on Equipment 3 and the shorter term rating is based on Equipment 2. There is no need to provide two continuous and two shorter term ratings from a reliability perspective.</p> <p>-It is not clear which facilities the additional thermal rating information will be required for as it is open to interpretation whether a facility is actually an impediment to generator deliverability or load serving.</p>
<p>Response: The FRSDT thanks you for your comment. For the situation that you mention, there would be no need to provide two sets of continuous and short term ratings unless these were requested by an entity per Requirement R8 and all of its Parts. Per the information in the comment form:</p>		

Organization	Yes or No ²	Question 1 Comment
		<p><i>For this example, Requirement R8, Part 1 and its sub-parts requires a Transmission Owner (and the Generator Owner that must comply with Requirement R2) to provide two data points as scheduled by requesting entities.</i></p> <ul style="list-style-type: none"> <i>• For the Continuous Rating: The Facility Rating (the Equipment Rating of E3) and identification of the most limiting equipment of the Facility (E3).</i> <i>• For the Shorter Term Rating: The Facility Rating (the Equipment Rating for E2) and identification of the most limiting equipment of the Facility (E2).</i> <p><i>For this example, Requirement R8, Part 2 and its sub-parts requires a Transmission Owner (and the Generator Owner that must comply with Requirement R2) to provide four data points upon request for a specific subset of Facilities.</i></p> <ul style="list-style-type: none"> <i>• For the Continuous Rating: Identification of the existing next most limiting equipment of the Facility (E2) and its Equipment Rating.</i> <i>• For the Shorter Term Rating: Identification of the existing next most limiting equipment of the Facility (E1) and its Equipment Rating.</i> <p>The diagram only indicates one possible example of a Facility with these types of ratings. The requestor should specify the Facility and the Facility Ratings information that they desire for applicable Facilities under Requirement R8.</p> <p>The FRSDT received many comments concerning the proposed requirement and its intent. Many stakeholders believe that more clarity is necessary. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. While it may vary between different Planning Coordinators and/or Reliability Coordinators, the term “impeding generator deliverability” generally refers to the transmission facility, which is limiting the ability to deliver the generation output to the aggregate load. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities are impacted. The FRSDT believes that this language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement. The additional Thermal Ratings to be provided under Requirement R8 apply to transmission Facilities owned by a Transmission Owner or a Generator Owner. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>
ISO New England, Inc. –		ISO-NE would support adoption of this Standard with the following modifications to the current red-lined version: add the phrase "applicable to each individual Normal and

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Kathleen Goodman		Emergency rating required to be provided" at the end of 8.1.2 and delete 8.2 altogether, as it is only a repeat of 8.1 and is not needed.
<p>Response: The FRSDT thanks you for your comment. The SDT believes the entire FAC 008-3 does not require any information beyond "Normal" and "Emergency" ratings as per Requirement R2, Part 2.4.2 and Requirement R3, Part 3.4.2. Parts 8.1 and 8.2 are not duplicative. Requirement R8, Part 8.2 relates to a "next most limiting" equipment while Requirement R8, Part 8.1 relates to the "most limiting" equipment. Without Part 8.2, the FRSDT does not believe that the requirements meet the FERC Directives.</p>		
Hydro-Quebec TransEnergie – Bernard Pelletier		It's not clear how to determine a city as Major (size, population, density). Hydro-Quebec has different functions as Transmission Owner, Transmission Planner, Reliability Coordinator, LSE, etc we would know how to determine a Major City. Major city must be clarified. Same as the definition of the load pocket to be clarified.
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above</p> <p>.</p> <p>Also Requirement 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is "under the Requester's authority", minimizing interpretation issues.</p>		
Louisville Gas and Electric Co.- Charles A. Freibert		LG&E and KU Energy have concerns about this modification. There are concerns as to how the limiting equipment data will be provided to the associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s)

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		and Transmission Operator(s). For LG&E and KU Energy, most (if not all) of the ratings communications are through Power Flow model updates or portal updates on the RC's website which do not have a means to update a field for the Limiting Element. The major concern is that this information MUST be provided as scheduled and not "as requested". It is unclear whether this allows for an RC/TOP/BA to "NOT" schedule it as an option.
<p>Response: The FRSDT thanks you for your comment. The information is to be provided only upon request. The standard remains silent on the format of the information. It is expected that entities requesting the information will do so with a preferred format suggestion or the two entities will coordinate with each other on an appropriate format.</p>		
Sierra Pacific Power Co.- Rich Salgo		Negative vote is provided due to ambiguity in the proposed language of sections 8.2 and 8.2.2. These sections do not make clear the intent of the proposed R8, that the demonstration of impact is only for a thermal limit of a Facility on another's system.
<p>Response: The FRSDT thanks you for your comment. The SDT has modified the language to make this distinction clear. Please see revised language in the Summary Consideration above.</p>		
Wisconsin Energy Corp. Anthony Jankowski		R8 applies only to Generator Owners subject to R2, that is, those who own the GSU and high-voltage leads to the transmission interconnection point. This Requirement needs to be clarified to indicate whether it applies only to the equipment between the GSU and the transmission interconnection point, or if it applies to all the equipment between the generator and the interconnection point. We maintain that the changes based on the FERC directive should not be applied to Generator Owners. The connection from the generator to the transmission system is a radial connection which by its nature does not significantly impact the power transfer capability across the Bulk Electric System. The effort and cost for Generator Owners to be subject to these additional requirements is not accompanied by an increase in reliability, and is therefore not justified.
<p>Response: The FRSDT thanks you for your comment. The clarification that you suggest is contained in R2 and is not necessary to repeat in R8.</p>		
Consolidated Edison Co. of New York Christopher L de Graffenried		RELIABILITY CONCERNS: (1) Key terms and phrases are undefined, including "most limiting," "next most limiting," "impediment," "impediment to generation deliverability," "impediment to service" and

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Organization	Yes or No ²	Question 1 Comment
Peter T Yost Wilket (Jack) Ng Nickesha P Carrol		<p>“major cities or load pockets.”</p> <p>(2) The event graph provided along with the proposed standard fully illustrates the complication/confusion created by the proposed wording. There is a different Element and rating reported depending upon the event duration used. Each element in the graph may be the “most limiting” or “next most limiting” Element at any point, depending upon the duration selected for reporting purposes. This problem needs to be addressed.</p> <p>(3) There is no Guidance documents to clarify the reliability standard’s requirements and meaning.</p> <p>COMMENTS WITH QUESTIONS:</p> <p>1. The drafting team needs to define the following terms a. “most limiting,” b. “next most limiting,” c. “impediment to generation deliverability,” d. “impediment to service,” and e. “major cities or load pockets”</p> <p>2. The drafting team needs to provide guidance on the meaning, scope and use of the word “impediment” as it is used in the terms “impediment to generation deliverability,” and “impediment to service.” a. What are the limitations of any “impediment,” e.g., 0.1%, 1%, 5% or 10% of what measure(s), the Facility Rating? b. Is there a dead band within or threshold below which the impediment is not material, e.g., +/-5%, and beyond which it is material? c. What is the reach of any impediment, e.g. within a substation, 1 mile, 10 miles (across a load area), 100 miles (across an interface), across a Balancing Authority (NYISO), or 1,000 miles (across the Eastern Interconnection)?</p> <p>3. The drafting team needs to provide guidance on the meaning, scope and use of the phrases “most limiting” and “next most limiting” Facility or Element. a. What are the timeframe (refer to event graph), rating type(s) and duration sought, e.g., normal conditions, short term or long-term exceedance? b. What is the context of the ratings sought, e.g., normal operation, N-1 contingency, with or without cooling? c. Is reporting applicable to a particular time, day, period or season, e.g., 14:00 hrs., July 6th peak, or Summer and Winter ratings? d. Is the reporting average, normalized, typical, maximum, at some temperature, e.g., 4 hr. max. rating at 86°F, 1 hr. max. normalized to 70°F, with or without forced cooling, at an 82°F cooling sink temperature (air, river or ocean)?</p> <p>4. The drafting team should consider producing a Guidance Document with definitions, example uses and a Frequently Asked Questions (FAQ) section to provide the industry</p>

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Organization	Yes or No ²	Question 1 Comment
		assistance and guidance. 5. What, if any, are respondent's obligations under R8.2 for areas or regions where IROL's or TTC are not limiting or are not used?
<p>Response: The FRSDT thanks you for your comment. Requirement R2, Part 2.3 and Requirement R3, Part 3.3 both refer to the "most limiting applicable Equipment Rating". The SDT believes that the meaning of "most limiting" is clear when read in context. Similarly, the SDT believes, 'next most limiting' is also clear when read in context. The SDT has responded to commenter's suggestions for clarity involving the relationship between the Facility and the Requester, as well as clarification related to thermal capabilities of the equipment referred to in Requirement R8, Part 8.2. The SDT believes that these clarifications largely address this commenter's concerns.</p> <p>For your suggestion regarding defining "most limiting", etc. The FRSDT does not believe that these terms need to be a defined term in the NERC Glossary.</p> <p>The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Guidance documents: Drafting teams are not under obligation to develop guidance documents for each standard. The incremental change to this standard is related to Requirement 8, Part 8.2. The FRSDT believes that sufficient guidance has been provided in the background material of the comment form.</p>		
ReliabilityFirst Corporation – Anthony E Jablonski		ReliabilityFirst generally agrees with the standard but has the following comments. 1. Why is there a parenthetical around the "and each Generator Owner subject to Requirement R2" language in R8? R2 is applicable to Generator Owners (with no qualifications) so therefore R8 is also applicable to Generator Owners. The beginning of

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		<p>R8 should simply state “Each Transmission Owner and Generator Owner shall provide...”</p> <p>2. In Part 8.2, the terms “major city or load pocket” are ambiguous and should be better defined within the standard.</p>
<p>Response: The FRSDT thanks you for your comment. 1) Requirement R8 is applicable to Generator Owners to the extent the Generator owner owns Transmission type equipment (Requirement R2). However, there is no intent to apply Requirement R8 to those facilities covered by Requirement R1 (The generating unit up to either side of the GSU).</p> <p>2) The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
Central Maine Power Company		<p>Requirement 8.1.2 states; "Identity of the most limiting equipment of the Facilities" Concern that this would be applicable to each individual Normal and Emergency rating, and be required to be provided. The proposed revision has gone beyond the intent of the FERC Directive. Requirement 8.2 states; "Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket." Unclear on what constitutes a "major city or load pocket". This text should be removed.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it</p>		

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Organization	Yes or No ²	Question 1 Comment
		<p>easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is “under the Requester’s authority”, minimizing interpretation issues.</p>
<p>Rochester Gas and Electric Corp. John C. Allen</p>		<p>Requirement 8.2 applies in the case of a "major city or load pocket". However, there is no definition or information on what would constitute a "major city or load pocket". Requirement 8.1.2, "Identity of the most limiting equipment of the Facilities", would be applicable to each individual Normal and Emergency rating, and be required to be provided. This goes beyond the intent of the FERC Directive.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the</p>		

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<p>Summary Consideration above</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is “under the Requester’s authority”, minimizing interpretation issues.</p> <p>The SDT believes the entire FAC 008-3 does not require any information beyond “Normal” and “Emergency” ratings as per Requirement R2, Part 2.4.2 and Requirement R3, Part 3.4.2.</p>		
<p>New York State Electric & Gas Corp- Raymond P Kinney.</p>		<p>Requirement 8.2 states; "Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:" There is insufficient information on what would constitute a "major city or load pocket".</p> <p>Recommend removal of Requirement 8.2. Requirement 8.1.2 states; "Identity of the most limiting equipment of the Facilities" This requirement would be applicable to each individual Normal and Emergency rating, and be required to be provided. This proposed revision has gone beyond the intent of the FERC Directive.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments – the</p>		

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Organization	Yes or No ²	Question 1 Comment
<p>next most limiting equipment for a subset of Facilities. Requirement R8, Parts 8.1.2 and 8.2 are not duplicative of each other.</p>		
<p>New York Power Authority William Palazzo</p>		<p>Requirement 8.2. - "Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester's Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:"</p> <p>Need to clarify what constitutes a major city or load pocket. Requirement 8.1.2. - "Identity of the most limiting equipment of the Facilities" This would be applicable to each individual Normal and Emergency rating, and be required to be provided. Believe that this proposed revision has gone beyond the intent of the FERC Directive. Requirement 8.2.2. The equipment's Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>The SDT's scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments – the next most limiting equipment for a subset of Facilities. Requirement R8, Parts 8.1.2 and 8.2 are not duplicative of each other.</p>		
<p>New Brunswick Power Transmission Corporation - Randy MacDonald</p>		<p>Section 8.2:Load pocket or major city is unclear. S</p>

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Organization	Yes or No ²	Question 1 Comment
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
<p>Public Utility District No. 1 of Snohomish County Snohomish County PUD No. 1</p>		<p>Snohomish PUD agree the R8 requirement addresses the Commission’s directive, however we are seeking only clarification of the standard’s language that, if addressed will enable the vote to be changed to Affirmative. In order to minimize ambiguity we ask the Drafting Team to consider making the request apply ONLY to a Facility whose Thermal Rating has system impacts as identified through the following comment:</p> <p>8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility whose Thermal Rating causes the Facility to be the Limiting Element and that the requester has identified as having an impact on their system affecting an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.1. Identity of the existing next most limiting equipment of the Facility</p> <p>8.2.2. The Equipment’s Thermal Rating for the next most limiting Component identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a significant change. Therefore, with minor modification, the SDT adopted the proposed change.</p>		
<p>Salt River Project</p>		<p>SRP believes that the proposed language of R8.2 and 8.2.2 is ambiguous and does not</p>

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		<p>make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for a Thermal limit of a Facility on another's system. SRP has provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. SRP believes this proposed language is clarifying in nature and not a substantive change. If this language is adopted by the drafting team we would vote in the affirmative for the proposed standard.</p> <p>8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester's Facility by creating with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.1. Identity of the existing next most limiting equipment of the Facility</p> <p>8.2.2. The Equipment equipment's Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words "Facilities under the Requester's authority" rather than the commenter's term "Requester's Facilities". The term "Requester's Facilities" could be interpreted as having an ownership relationship. The SDT used the term "Facilities under the Requester's authority" to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
<p>City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power</p> <p>Tacoma Public Utilities</p>		<p>Tacoma Power is voting Negative and suggests changing the following two sub-requirements:</p> <p>8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester's Facility by creating with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p>

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Organization	Yes or No ²	Question 1 Comment
		8.2.2. The Equipment equipment's Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1. Thank you for your consideration.
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words "Facilities under the Requester's authority" rather than the commenter's term "Requester's Facilities". The term "Requester's Facilities" could be interpreted as having an ownership relationship. The SDT used the term "Facilities under the Requester's authority" to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
U.S. Bureau of Reclamation		<p>The proposed language of parts 8.2, 8.2.2, and M8 is ambiguous and does not make clear the intent of the proposed Requirement 8, which is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another's system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, we have provided proposed alternative language for parts 8.2, 8.2.2, and M8 which we believe clarifies the intent, while not changing the actual requirements.</p> <p>8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester's Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.2. The equipment's Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words "Facilities under the Requester's authority" rather than the commenter's term "Requester's Facilities". The term "Requester's Facilities" could be interpreted as having an ownership relationship. The SDT used the term "Facilities under the Requester's authority" to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
MidAmerican Energy Co.		The standards drafting team did not perform its defined function as the technical standards expert and developer by simply transferring FERC words from Order 693 into a

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Organization	Yes or No ²	Question 1 Comment
Terry Harbour		revised standard. NERC standards are to be concrete and measurable. Companies should not be held to violations for subjective standards. Therefore, the vague and ambiguous wording proposed in the FERC directive should be deleted and limited to the IROL language for 8.2 only as equivalent and superior to the FERC directive. If the drafting team feels compelled to address the additional FERC Order 693 words such as TTC limits, impeding generation, or impeding service to major load pockets or cities, then specific, measurable tests related to Section 215 such as impediments that could result in TPL standards violations beyond NERC category C conditions (or equivalent), instability, uncontrolled separation, or cascading should be developed and placed in the revised standards ratings.
<p>Response: The FRSDT thanks you for your comment. The FRSDT received many comments concerning the proposed requirement and its intent. Many stakeholders believe that more clarity is necessary. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. While it may vary between different Planning Coordinators and/or Reliability Coordinators, the term “impeding generator deliverability” generally refers to the transmission facility, which is limiting the ability to deliver the generation output to the aggregate load. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. The FRSDT believes that this language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
Roger C Zaklukiewicz		The terms in 8.2 are not well defined and subject to interpretation. 8.2 also appears to go beyond the FERC Directive. An immediate review after passage is certainly in order.

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Organization	Yes or No ²	Question 1 Comment
<p>Response: The FRSDT thanks you for your comment. The FRSDT received many comments concerning the proposed requirement and its intent. Many stakeholders believe that more clarity is necessary. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities are impacted. The FRSDT believes that this language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is “under the Requester’s authority”, minimizing interpretation issues.</p>		
<p>Southwest Power Pool Charles H Yeung</p>		<p>There are outstanding technical issues that have not been addressed concerning the applicability to Load Pockets. Because of the parallel comment/vote schedule, we cannot support the proposed language until these issues are clarified.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the</p>		

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Organization	Yes or No ²	Question 1 Comment
<p>Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is “under the Requester’s authority”, minimizing interpretation issues.</p>		
<p>Tennessee Valley Authority</p> <p>Larry Akens;</p> <p>Ian S Grant;</p> <p>David Thompson;</p> <p>Marjorie S. Parsons</p>		<p>TO Comments</p> <ul style="list-style-type: none"> o Is it intended that the TO is providing information to the TO in R8? o The reference to ‘new facilities’ in R8 and subsequent requirements should be considered for revision. Consider the revision to state “new facilities which are designed” or address new facilities separately. If these are future facilities, it is often difficult to know what some equipment ratings may be until they are designed. A conservative value may be assumed - a new line may be planned to be good for 1800A for example. What exact equipment (R8.1.2) is going to be the limit is unknown until the design is further into planning. With this in mind it is difficult in some cases to determine the exact facility rating (1810A or 1920A would both be acceptable to the initial planning) much less the next most limiting equipment for future facilities.
<p>Response: The FRSDT thanks you for your comment. Per Requirement R8 the requesting entity is restricted to Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s). Specifically for R8, Part 8.2 the requester must be from an entity that has the ‘authority’ over the Facility in question.</p> <p>The term “new Facilities” does not include Facilities that will be placed in service beyond the Operations Planning time horizon, which is the Time Horizon for Requirements R7 and R8.</p>		
<p>Austin Energy</p> <p>Chelan County Public Utility District #1</p> <p>City of Austin dba Austin Energy</p> <p>City of Redding</p> <p>Orlando Utilities Commission</p> <p>Public Utility District No. 1 of Chelan</p>		<p>We agree the R8 requirement addresses the Commission’s directive, however we are seeking only clarification of the standard’s language that, if addressed will enable the vote to be changed to Affirmative.</p> <p>In order to minimize ambiguity we ask the Drafting Team to consider making the request apply ONLY to a Facility whose Thermal Rating has system impacts as identified through the following comment:</p> <p>8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility whose Thermal Rating causes the Facility to be the Limiting Element and that the requester has identified as having an impact on their system affecting an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding</p>

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Organization	Yes or No ²	Question 1 Comment
County		<p>generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.1. Identity of the existing next most limiting equipment of the Facility</p> <p>8.2.2. The Equipment’s Thermal Rating for the next most limiting Component identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT used the term “Facilities under the Requester’s authority” to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
<p>City of Austin dba Austin Energy Reza Ebrahimian</p>		<p>We agree the R8 requirement addresses the Commission’s directive, however we are seeking only clarification of the standard’s language that, if addressed will enable the vote to be changed to Affirmative. In order to minimize ambiguity we ask the Drafting Team to consider making the request apply ONLY to a Facility whose Thermal Rating has system impacts as identified through the following comment modifying R8.2:</p> <p>8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility whose Thermal Rating causes the Facility to be the Limiting Element and that the requester has identified as having an impact on their system affecting an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.1. Identity of the existing next most limiting equipment of the Facility</p> <p>8.2.2. The Equipment’s Thermal Rating for the next most limiting Component identified in Requirement R8, Part 8.2.1.</p> <p>Supporting Discussion: The FAC-008-3 R8 requirement inappropriately only considers the next element’s thermal limit as being the ‘fix’ that potentially exposes the system to a greater reliability impact as follows:</p> <ul style="list-style-type: none"> o Total Transfer Capability considers the operation of multiple transmission components that appears to be confusing the single circuit and its series components with the definition of Facility.

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Organization	Yes or No ²	Question 1 Comment
		<p>o Limitation of a Total Transfer Capability and identifying a single element and its 'next most limiting component' ignores the intrinsic interaction/loading of other transmission elements within the system. In consideration of 'next most limiting element' identifying the thermal limit of an individual circuit ignores other non-thermal system limitations such as stability issues that may be on the cusp of exposure thereby inadvertently misleading the requestor to the false operation limit.</p> <p>Additionally: Under certain system conditions an element would reach its thermal limit just prior to the stability limitation. Communicating the 'next most limiting element' would give a false representation of the system's ability thereby jeopardizing reliability system. If only considering the series elements as the facility's limitations, dynamic studies and other non-thermal restrictions may impose limitations prior to the 'next' element's thermal limitation; this poses a greater reliability threat. If multiple parallel lines which are, through their combined operation, used in the determination of a IROLs, Total Transfer Capability or major load/cities and should be considered as a facility. Then identifying the next limiting thermal element rating may not necessarily be achievable as system dynamic limitations may pose the 'next' limitation and are not necessarily dependant on a thermal limit of the elements for the defined facility.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT used the term "Facilities under the Requester's authority" to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
<p>Lower Colorado River Authority</p> <p>MEAG Power</p> <p>Municipal Electric Authority of Georgia</p>		<p>We agree the R8 requirement addresses the Commission's directive, however we are seeking only clarification of the standard's language that, if addressed will enable the vote to be changed to Affirmative. In order to minimize ambiguity we ask the Drafting Team to consider making the request apply ONLY to a Facility whose Thermal Rating has system impacts as identified through the following comment:</p> <p>8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester's Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer</p>

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Organization	Yes or No ²	Question 1 Comment
Orlando Utilities Commission		<p>Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.1. Identity of the existing next most limiting equipment of the Facility</p> <p>8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p> <p>Please note that 8.2 and 8.2.2 have been modified in this comment, but the editor does not allow strikeouts and underlines, so please read carefully.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT used the term “Facilities under the Requester’s authority” to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
<p>Platte River Power Authority</p> <p>Pete Ungerman</p> <p>Carol Ballantine</p> <p>John C. Collins</p>		<p>We agree the R8 requirement addresses the Commission’s directive, however we are seeking only clarification of the standard’s language that, if addressed will enable the vote to be changed to Affirmative. In order to minimize ambiguity we ask the Drafting Team to consider making the request apply ONLY to a Facility whose Thermal Rating has system impacts as identified through the following comment:</p> <p>Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.1. Identity of the existing next most limiting equipment of the Facility</p> <p>8.2.2. The Equipment equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>

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Organization	Yes or No ²	Question 1 Comment
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words "Facilities under the Requester's authority" rather than the commenter's term "Requester's Facilities". The term "Requester's Facilities" could be interpreted as having an ownership relationship. The SDT used the term "Facilities under the Requester's authority" to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
<p>Modesto Irrigation District Spencer Tacke</p>		<p>We are voting NO because Section 8.2 is unclear as to what "impeding generator deliverability, or impeding service to a major city or load pocket:" means, or how it can be interpreted. Also, it is not clear why just a "Thermal Rating" is considered, as protective relay settings may be the limiting element and basis of the rating in question. Thank you.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is "under the Requester's authority", minimizing interpretation issues.</p>		
<p>Idaho Power Company Ronald Schellberg</p>		<p>We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another's system. Because of this ambiguity and the potential for</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot:</p> <p>8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words “Facilities under the Requester’s authority” rather than the commenter’s term “Requester’s Facilities”. The term “Requester’s Facilities” could be interpreted as having an ownership relationship. The SDT used the term “Facilities under the Requester’s authority” to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
<p>Pacific Gas and Electric Company - Richard J. Padilla</p>		<p>We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 is ambiguous and appears to contradict the basic rationale for FAC-008 and FAC-009 for generation assets. Because of this ambiguity and the potential for misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. FAC-008 requires that entities address a normal and an emergency rating.</p> <p>In addition, per equipment standards, some equipment has short time overload capability and these capabilities are also addressed in the FAC rating standards. Therefore, for generation the NERC identified scenarios fall into one of two categories. 1) the next most limiting factor is already addressed in the emergency or short-time rating, or 2) entities are</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>allowing facilities to exceed ratings and get into operating difficulty, which is a violation of the standard. If this defined scenario is applicable to transmission elements, limit the applicability for requirement 8.2 to transmission only.</p>
<p>Response: The FRSDT thanks you for your comment. Requirement R8, Part 8.2 only applies to transmission Facilities that a Generator Owner may own. It is not applicable to generating Facilities covered under Requirement R1.</p>		
<p>Platte River Power Authority-Terry Baker</p>		<p>We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another’s system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot.</p> <p>8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p> <p>End of proposed comment</p> <p>WECC stakeholders reviewed the proposed Standard, FAC-008-3, and concluded that the current wording of parts 8.2 and 8.2.2 is ambiguous and without the proposed clarifying language could lead to confusion related to the intended purpose of this standard. Based on the Purpose/Industry Need on the NERC website which in part states: “In order to determine facility ratings, entities must identify the most limiting component that comprises</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>the facility, based on a validated methodology that considers the specific characteristics and ratings of all of the components to determine their limits for a range of ambient conditions, including if and for what duration these limits can be exceeded. This is, in part, because the limiting element upon which a facility rating is based can change under different operating conditions. For example, an underground high voltage cable may be the limiting element for continuous ratings, but a disconnect switch may be the limiting element for a four-hour emergency rating. With heavy power flows from generators through critical facilities to load, contingency conditions could reveal a thermal overload above the normal rating of the first limiting component of one of these facilities. However, that component also likely has a documented short time rating that could sustain the overload. If the second-most limiting component does not afford much increase in rating above the first, and its overload can result in the unintended removal of the facility from service (i.e., a relay or other protection system component that trips a facility out of service due to the overload), the prior identification of this second limiting component could alter the mitigation plans and avoid relay operations that trip facilities out-of-service, and thus potentially prevent a cascading event.” Without the suggested clarification for parts 8.2 and 8.2.2, concerns exist that it is unclear that the intent is to identify the equipment’s next Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1. A complete copy of the Facility Ratings standard and associated materials can be viewed at: http://www.nerc.com/filez/standards/Project_2009-06_Facility_Ratings.html If you determine that you will vote NO, but do not submit the suggested comment above, it is important that you provide a comment with your vote indicating the reason(s) why you voted NO and suggested modifications that would make the standard acceptable. In addition to the ballot of FAC-008-3, a non-binding poll of the Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) is being conducted. WECC staff is not aware of any significant concerns related to the proposed VRFs and VSLs and recommends an affirmative vote for the VRFs and VSLs. If you determine that you will vote NO on the VRFs and VSLs it is important that you provide a comment with your vote indicating the reason(s) why you voted NO and suggested modifications that would make the VRFs/VSLs acceptable All WECC entities that are registered in the Facility Ratings Ballot Pool are urged to cast their ballots prior to the close of the ballot period.</p>

Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words “Facilities under the Requester’s authority” rather than the commenter’s term “Requester’s Facilities”.

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Organization	Yes or No ²	Question 1 Comment
<p>The term "Requester's Facilities" could be interpreted as having an ownership relationship. The SDT used the term "Facilities under the Requester's authority" to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
<p>Western Electricity Coordinating Council Colorado Springs Utilities Pacific Gas and Electric Company Public Utility District No. 2 of Grant County Sacramento Municipal Utility District Seattle City Light U.S. Army Corps of Engineers</p>		<p>We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another's system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot.</p> <p>8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester's Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:</p> <p>8.2.2. The equipment's Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words "Facilities under the Requester's authority" rather than the commenter's term "Requester's Facilities". The term "Requester's Facilities" could be interpreted as having an ownership relationship. The SDT used the term "Facilities under the Requester's authority" to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
<p>Independent Electricity System Operator</p>		<p>While the language of Requirement 8, Part 8.2 comes out of the Order 693, paragraph</p>

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Organization	Yes or No ²	Question 1 Comment
Kim Warren		756, we believe the following wording can be improved. In particular, the reference to impeding service to a major city or load pocket is troublesome since there lacks general guideline or definition of what constitutes “a major city or load pocket”. We therefore suggest this part be revised to: Revise: “... that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket.” to: “... that the requester has identified is part of an Interconnection Reliability Operating Limit or other System Operating Limit, or limits Total Transfer Capability or generator deliverability under conditions specified by the requesting entities.”
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
Xcel Energy, Inc.- Gregory L Pieper;Michael Ibold		Xcel Energy does not feel that the proposed revisions, as drafted, meet the intent of FERC’s directive and do not benefit reliability. Additionally, the information that would be provided to a requester would either be rendered useless or inappropriately used in maintenance, planning and operational activities. Please see our full set of comments for more detail.
<p>Response: The FRSDT thanks you for your comment. Comments provided in Question 5.</p>		
Northeast Power Coordinating Council	No	8.2 should be deleted. What it requires goes beyond what is mandated in the FERC Directive. However, regarding the language in 8.2, major city, and load pocket must be defined. Those terms are vague, and subject to interpretation. 8.1.2 should be revised to read: Identity of the most limiting equipment of the Facilities

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Organization	Yes or No ²	Question 1 Comment
		applicable to each individual Normal and Emergency rating required to be provided.
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics contained in Requirement R8, Part 8.2.</p> <p>The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above. Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is “under the Requester’s authority”, minimizing interpretation issues.</p> <p>8.1.2: The SDT believes the entire FAC 008-3 does not require any information beyond “Normal” and “Emergency” ratings as per Requirement R2, Part 2.4.2 and Requirement R3, Part 3.4.2. Adding the verbiage to Part 8.1.2 would therefore be redundant.</p>		
Pepco Holdings Inc	No	Although the proposed R8 contains the “words” from the FERC directives, the requirement does not directly increase reliability in real time, may cause operational confusion and is more appropriately addressed in the long term planning function not in the Operations Planning time horizon. For either the 1st limiting component or the next, both should be by request only. If the entity needs it let them request. In many cases the entity will never use the component data in operations. The actual piece of equipment that limits a facilities rating does not enter into operators decisions made in the operational time frame. The system limits are either an IROL or an SOL. Other procedures call for the operators to monitor the normal ratings and the contingency limits (or IROLs or SOLs) and take actions prior the flows reaching those limits. If the limits are violated due to a multiple facility trip there is a specified time frame to correct the violation. Use of the “next” most limiting

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Organization	Yes or No ²	Question 1 Comment
		<p>piece of equipment is not practical or appropriate in real time operations. The requirement uses terms that are not defined: deliverability, major city and load pocket. Although that is the words used by FERC in Order 693, they do not conform to existing terminology and methodology in operating the BES. Maybe the situations when a request could be made for the second limit/rating ought to be any IROL, SOL or BES facility limitation.</p>
<p>Response: The FRSDT thanks you for your comment. The identification of the most limiting equipment in a Facility (8.1.2) only needs to be provided, as scheduled by a requester. This Standard does not require any entity to request such information. The Standard does not create an obligation on an entity for information that has not been requested by a requester defined in Requirement R8. The SDT does not disagree with the statement of use of these data in real-time. Given that the data subject to Requirement R8, Part 8.2 the provider has 30 days to supply substantiates that these data would not be expected for use in real-time.</p> <p>The FRSDT thanks you for your comment. The FRSDT received many comments concerning the proposed requirement and its intent. Many stakeholders believe that more clarity is necessary. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. While it may vary between different Planning Coordinators and/or Reliability Coordinators, the term “impeding generator deliverability” generally refers to the transmission facility, which is limiting the ability to deliver the generation output to the aggregate load. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term “a major city or load pocket” to “a major load center”. Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. The FRSDT believes that this language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is “under the Requester’s authority”, minimizing interpretation issues.</p>		

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Organization	Yes or No ²	Question 1 Comment
Public Service Enterprise Group	No	<p>Comment #1:PSEG suggest numbering the 4 scenarios in section 8.2, similar to how it was numbered in the FERC paragraph 756. Also, the FERC paragraph used the word “causing” but the standard used the word “having”. Therefore it would read as: “Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that the requester has identified as causing one of the following 1. An Interconnection Reliability Operating Limit (IROL); 2. A limitation of Total Transfer Capability, 3. Impeding generator deliverability, or; 4. Impeding service to a major city or load pocket.”Comment #2:Would the requesting entity be allowed to ask for this data at each of the registered entity’s facilities at the same time, or would it only be one facility at a time?</p>
<p>Response: The SDT thanks you for this recommendation. It has been applied.</p>		
Manitoba Hydro	No	<p>It is unclear which facilities the additional thermal rating information will be required for. FERC asked for additional thermal rating information only for those facilities for which thermal ratings cause the following: (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major cities or load pockets. It is open to interpretation whether a facility is actually an impediment to generator deliverability or an impediment to load serving: -Should one perform n-1 analysis and determine whether a thermal limit is violated? Or is n-2 analysis necessary? -Is a radial feed to a generator an impediment to delivery? -What constitutes a major city or load pocket? One would assume at least 300 MW to be consistent with some other NERC reporting requirements. Requirement R8 should be rewritten to clarify which facilities this additional thermal rating information will be required for. Perhaps making it a bright line standard (for example facilities greater than 300 kV) would be a simpler approach.</p>
<p>Response: The FRSDT thanks you for your comment. The FRSDT received many comments concerning the proposed requirement and its intent. Many stakeholders believe that more clarity is necessary. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. While it may vary between different Planning Coordinators and/or Reliability Coordinators, the term “impeding generator deliverability” generally refers to the transmission facility, which is limiting the ability to deliver the generation output to the aggregate load. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on</p>		

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Organization	Yes or No ²	Question 1 Comment
<p>the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. The FRSDT believes that this language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
Pacific Gas & electric Company	No	<p>Please consider following revisions:8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits USE OF the Requester's Facilities by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:8.2.1. Identity of the existing next most limiting equipment of the Facility 8.2.2. The equipment's Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words "Facilities under the Requester's authority" rather than the commenter's term "Requester's Facilities". The term "Requester's Facilities" could be interpreted as having an ownership relationship. The SDT used the term "Facilities under the Requester's authority" to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
We Energies	No	<p>R8 applies only to Generator Owners subject to R2, that is, those who own the GSU and high-voltage leads to the transmission interconnection point. This Requirement needs to be clarified to indicate whether it applies only to the equipment between the GSU and the transmission interconnection point, or if it applies to all the equipment between the generator and the interconnection point.</p>
<p>Response: The FRSDT thanks you for your comment. The clarity that you suggest is already contained in R1 and R2 and the FRSDT does</p>		

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Organization	Yes or No ²	Question 1 Comment
not believe that additional verbiage in R8 is necessary.		
IRC Standards Review Committee	No	Requirement 8.2 goes beyond what is mandated in the FERC Directive. Knowledge of these additional ratings is currently required through a collection of data in other IRO/TOP/TPL Standards. In addition Requirement 8.2 introduces the terms major city, and load pocket. These terms are not defined and would be subject to interpretation. This would result in a request for interpretation or a compliance application notice. If the requirement is retained, 8.1.2 should be revised to read: Identity of the most limiting equipment of the Facilities applicable to each individual Normal and Emergency rating required to be provided. However, as stated, this is a redundant requirement.
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is "under the Requester's authority", minimizing interpretation issues.</p> <p>The SDT believes the entire FAC 008-3 does not require any information beyond "Normal" and "Emergency" ratings as per Requirement R2, Part 2.4.2 and Requirement R3, Part 3.4.2.</p>		
New York Power Authority – Arnold J. Schuff	No	Requirement 8.2. - Need to clarify what constitutes a major city or load pocket. Requirement 8.1.2. - Believe that this would be applicable to each individual Normal and Emergency rating thus required to be provided. Believe that the proposed revision has gone beyond the intent of the FERC Directive.

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Organization	Yes or No ²	Question 1 Comment
		Requirement 8.2.2. - should state "The equipment's Thermal Rating"
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is "under the Requester's authority", minimizing interpretation issues.</p> <p>The SDT believes the entire FAC 008-3 does not require any information beyond "Normal" and "Emergency" ratings as per Requirement R2, Part 2.4.2 and Requirement R3, Part 3.4.2.</p> <p>Requirement R8, Part 8.2.2 was modified to use the phrase, "The Thermal Rating for. . ."</p>		
Brazos Electric Power Cooperative	No	See response to Question 5.
<p>Response: The FRSDT thanks you for your comment. See response to Question 5.</p>		
Ameren	No	The clarification from the Commission seems to require the additional rating and limiting equipment only for the specific facilities related to 1) IROL, 2) TTC, 3) generation deliverability, or 4) transmission service to municipals or load pockets. Therefore, if this must be included, we believe that Requirement R8.1.2 should be removed from R8.1 and included in R8.2.
<p>Response: The FRSDT thanks you for your comment. FERC Order 693 paragraph 693, requires the identification of the most limiting</p>		

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Organization	Yes or No ²	Question 1 Comment
<p>equipment.The commission’s proposed modification would require identifying and documenting the limiting component for all facilities....” Hence the need for Requirement R8, Part 8.1.2. The commenter should note that this Standard does not create an obligation to provide data absent a schedule to provide such information from a Requester. Therefore, if there is no request, there is no obligation.</p>		
Indeck Energy Services	No	<p>The FERC order addresses limiting elements for different time periods, continuous versus short term. R8 is drafted based upon the diagram in the printed comment form which misses FERC’s point. At either the continuous duty period (eg 24 hours) or at the emergency (eg 4 hour) duty period, the limiting element will always limit the equipment. The FERC order identifies the difference between the E3 limiting in the continuous duty period and E2 in the emergency duty period. And if the duty period was further modified, such as to 15 minute duty period, then a different element such as E1 might be limiting. R8 doesn't grasp FERC's issue. An IROL or other analysis would seem to be for a different period than what some TO's or GO's would rate their facilities at based upon R2. R8 should define in the Request to the TO or GO, what duty period is relevant for the particular condition that is being analyzed (eg 15 minutes or 4 hours) and request a rating for that duty period.</p>
<p>Response: The FRSDT thanks you for your comment. The FERC Order ‘only’ requires the identification of, and the corresponding rating of, the next most limiting equipment for a subset of Facilities, and if requested by an entity for which that Facility is under its authority. The SDT believes that Requirement R8, Part 8.2 meets the intent of this FERC Order.</p>		
SRP	No	<p>The language of requirement R8.2 seems to allow a utility to wait until a request is received to prepare the information. However, if a neighboring utility asked for bulk electric system data, the 30 calendar day time limit would not be enough.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT recommends a minor modification of the language in Requirement R8, Part 8.2. The SDT used the term “Facilities under the Requester’s authority” to avoid potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester. It is envisioned that studies have been done that provide the information under the requirement. The FRSDT does not believe that additional studies will be required to provide this information.</p>		
SPP Reliability Standards Development	No	<p>The order mentions that the increase in rating also should be provided along with the second most limiting element rating.</p>

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<p>Response: The FRSDT thanks you for your comment. Agreed, however Requirement R8, Part 8.1 requires the Facility Rating, and Part 8.2 requires the rating for the subset of Facilities not considering the most limiting equipment. The difference between those values is the 'increase'.</p>		
<p>Southern Company Generation (SCG) Technical Services</p>	<p>No</p>	<p>The R8 requirement does reflect the Directive however we believe that item (3) should be limited to generation having firm transmission service. Proposed change: 8.2.1. If a Facility has a shorter term rating higher than its continuous rating such that another piece of equipment in the Facility would become the most limiting in the shorter term then the identity of the existing next most limiting equipment of the Facility 8.2.2. If the condition in 8.2.1 exists then provide the Equipment Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1. Otherwise indicate to the requestor that the limit provided in 8.1 applies.</p>
<p>Response: The FRSDT thanks you for your comment. The language of R8 has been revised to provide better clarity regarding the information requested and the entities who can request it. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
<p>Southern Company Transmission</p>	<p>No</p>	<p>The R8 requirement does reflect the Directive however we believe that item (3) should be limited to generators who have firm transmission service. We also have concerns over the undefined terms used in item (4) "major cities" and "load pockets". Also see question 5 comments. Proposed change 8.2.1. If a Facility has a shorter term rating higher than its continuous rating such that another piece of equipment in the Facility would become the most limiting in the shorter term then the identity of the existing next most limiting equipment of the Facility 8.2.2. If the condition in 8.2.1 exists then provide the Equipment Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1. Otherwise indicate to the requestor that the limit provided in 8.1 applies.</p>
<p>Response: The FRSDT thanks you for your comment. The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to</p>		

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Organization	Yes or No ²	Question 1 Comment
<p>erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>The language of R8 has been revised to provide better clarity regarding the information requested and the entities who can request it. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
Pacific Northwest Small Public Power Utility Comment Group	No	<p>The SDT stated in the recent webinar that they did not consider R7 and R8 to be onerous. Data requests would be infrequent and for specific facilities. The comment group disagrees, since every audit consists of a full data request for all actively monitored standards. Affected entities may be expected to provide the data for every facility at each audit. Please add language to the two requirements indicating that data requests are only for operating the interconnected BES reliably, and not for compliance assessment.</p>
<p>Response: The FRSDT thanks you for your comment. The FRSDT cannot speak to compliance and audit issues for this standard. The requirements dictate that entities provide information upon request from an RC, TP, TOP, TO or PC. If there are no requests from these entities, then there is no data to be supplied. Auditors are not included in the list.</p>		
Bonneville Power Administration	No	<p>We believe we understand the intent of the requirement, but do not believe that it is adequately communicated. Therefore, we are suggesting alternative language for R8.2 and R8.2.2 that if included would allow us to vote yes during the next ballot. Revised language:8.2 Within 30 calendar days (or a later date if specified by the requesting entity), for any requested Facility that has equipment with a Thermal Rating that limits the requesting entity’s Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words “Facilities under the Requester’s authority” rather than the commenter’s term “Requester’s Facilities”. The term “Requester’s Facilities” could be interpreted as having an ownership relationship. The SDT used the term “Facilities under the Requester’s authority” to avoid that potential</p>		

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<p>confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
BC Hydro and Power Authority	No	<p>We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another’s system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot.8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
<p>Response: The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words “Facilities under the Requester’s authority” rather than the commenter’s term “Requester’s Facilities”. The term “Requester’s Facilities” could be interpreted as having an ownership relationship. The SDT used the term “Facilities under the Requester’s authority” to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
Seattle City Light	No	<p>We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another’s system. Because of this ambiguity and the potential for</p>

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		<p>misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot.8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1</p>
<p>Response: The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words “Facilities under the Requester’s authority” rather than the commenter’s term “Requester’s Facilities”. The term “Requester’s Facilities” could be interpreted as having an ownership relationship. The SDT used the term “Facilities under the Requester’s authority” to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		
Xcel Energy	No	<p>Xcel Energy does not believe that the proposed Requirement 8 meets the intent of Paragraph 756 of Order 693, nor is it related to reliability. We believe FERC’s directive was focused on the “prior identification of this second limiting component” in order to allow entities an opportunity to take mitigating actions that may help avoid events that could lead to cascading. This would indicate to us that FERC wanted to see a planning requirement, which would then potentially lead to maintenance and operational subsequent actions. As drafted, the requirement does not encourage proactive planning-related activities. In practice, planning entities may request this information and perform such proactive assessments. But, there is no requirement for them to do so, as we believe FERC had intended.</p> <p>The FRSDT believes that entities that request the information in R7 and R8 have intentions of performing studies. You are correct that there is no requirement to run additional studies. The FRSDT has met the language of the FERC directive.</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>Furthermore, from a system operations perspective, there is no reliability benefit gained from knowing the 2nd most limiting element and its rating. The 1st most limiting factor must be respected and the system must be operated in a manner that doesn't violate that limit. Knowledge of the 2nd most limiting factor, or any other limiting factor, does not affect the operation of the system. If the intent of this requirement was to focus on the planning of the BES, it is misguided and could lead to erroneous assumptions. In paragraph 76 of its September 16, 2010 Order Denying Rehearing, FERC recognizes that facility ratings can change under different operating conditions. Indeed, the discussion centers around the fact that different equipment can use different time periods to determine the ratings, i.e. 4 hour, 8 hour, or ½ hour). The standard only asks for an ambiguous next most limiting element. On the Xcel Energy systems, there are 4 ratings that are considered; summer normal, summer emergency, winter normal and winter emergency. It is not unusual for different pieces of equipment to be the limiting (or 2nd most limiting) element depending upon the rating under investigation. To determine the increase in a facility rating if the most limiting element is no longer in place, one would need to investigate all four ratings. In order to come up with a meaningful increase in a facility's rating, a more detailed study would be required, and simply identifying the 2nd most limiting element and that element's rating may not give an accurate picture of the system. Therefore, the requestor would also need to identify the time period that is under investigation (summer, winter, normal, continuous, emergency or short-term), and would require information around how the requested rating was developed. In addition, further consideration is needed regarding the term "next most limiting element." For instance, if your facility contains 3 CTs that all have the same equipment rating, does the "next most limiting element" mean the second of 3 CTs (in this example)? Or, does it mean the element after any and all equipment that currently limits the rating of the facility? Another example could be a jumper and a switch, both with the same equipment rating. Does the "next most limiting element" mean the switch (assuming the jumper was listed as the most limiting element)? Obviously, if multiple pieces of equipment have the same rating, then providing another piece of equipment with the same rating doesn't provide any new information. However, only providing the equipment with the next highest rating could seriously understate the work involved in getting to that higher rating. There could be multiple pieces of equipment that must be replaced to get to a higher rating.</p> <p>In order to determine "most limiting" equipment for a Facility, an entity must know which equipment comprises the facility and what the respective limitations are. Since this information has already been determined, an entity need simply review its records and</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>supply the information to the requestor for the specified Facility.</p> <p>Likewise, further consideration and refinement is needed for the terms “major city” and “load pocket”. Depending upon the perspective of the various parties involved, what constitutes a major city or load pocket could greatly vary. Additionally, there could be a city or load pocket on a radial line that has no effect whatsoever on the BES. Instead, we recommend defining a “major city” or “load pocket” in quantitative terms such as a certain population or megawatts, as is the case in EOP-004-1.</p> <p>The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>
<p>Response: The FRSDT thanks you for your comment. Please see responses above.</p>		
BGE	Yes	
Clark Public Utilities	Yes	

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Organization	Yes or No ²	Question 1 Comment
Dominion	Yes	
East Kentucky Power Cooperative	Yes	
Georgia Transmission Corporation	Yes	
Imperial Irrigation District	Yes	
Luminant Power	Yes	
NERC Standards Review Subcommittee	Yes	
New Harquahala Generating Co.	Yes	
Oklahoma Municipal Power Authority	Yes	
South Carolina Electric and Gas	Yes	
Tri-State G&T	Yes	
United Illuminating Company	Yes	
GDS Associates	Yes	<p>a. We do agree that the proposed requirement R8 addresses FERC directive from Order 693, Paragraph 756, however we disagree with the language used within the requirement in several instances as follows:</p> <ul style="list-style-type: none"> o The applicability to the GO should not be stated in parenthesis. We suggest rewording such as “Each Transmission Owner and Generator Owner shall provide [...]” <p>The style incorporated is necessary to indicate that this only applies to a GO who has Facilities applicable to Requirement R2. R8 is not applicable to all GOs.</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>o The information provided by the GO and TO is based upon their own process and schedule and may not coordinate with the request from the RC, TP, etc. FR SDT explained that “If one party declines to agree to a schedule, then both parties could be in violation of the requirement. If a requesting entity imposes unreasonable schedules for obtaining the ratings, the responding entity should have recourse through NERC and/or FERC”, however we believe that rather to pile up the entities found noncompliant due to the schedule incompatibility, the standard shall be adjusted to permit reasonable timeframes.</p> <p>If both parties agree to an alternate schedule, then this should be documented and provided as evidence of compliance with the requirement.</p> <p>o It is unclear why two most limiting pieces of equipment must be identified. If a Generator or Transmission Owner must notify and provide its Facility Ratings for new or re-rated facilities as required in R7 what purpose does the second limiting factor have?</p> <p>Please refer to the background information provided with the posting of the standard. It explains the reliability benefits of the requirement.</p>
<p>Response: The FRSDT thanks you for your comment. Please see responses above.</p>		
Exelon	Yes	<p>Although Requirement R8 addresses the FERC directive, this proposed requirement appears to provide no reliability benefit. The current standard requires that all ratings “shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility”. The proposed Requirement R8 specifies that if requested, a new facility rating based on the second most limiting component be provided even though an existing facility rating based on the most limiting component already exists. If the transmission system is operated utilizing the facility rating based on the second most limiting component, operators could exceed the equipment rating of the first most limiting component and damage that piece of equipment as its rating capability would be exceeded. If the facility rating based on the second most limiting component is intended to be used by operations support staff so they could evaluate the need for a shorter duration rating for a future planned event, it still would have no value. If a shorter duration rating needs to be established, then simply knowing the rating of the second most limiting component of an existing rating is meaningless because it is based on a different duration.</p>

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Organization	Yes or No ²	Question 1 Comment
		When determining a facility rating all component ratings comprising the facility must be considered based on the planned rating duration, not just the second most limiting component. Thus the confusion and possible reliability harm caused by providing a facility rating based on the second most limiting component shows that knowing the second most limiting component for the current ratings has no value.
<p>Response: The FRSDT thanks you for your comment. Within the Comment Form (Reliability Objective Discussion), it states:“The directive was not intended to provide the System Operator with information to change ratings in real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause</p>		
American Transmission Company, LLC	Yes	ATC proposes revising the wording of Requirement R8 to more carefully refer to the Thermal Ratings of the requested Facilities: (see changes below)R8.1 . . .R8.1.1 Thermal Ratings for the requested FacilitiesR8.1.2 Identify the limiting equipment associated with the Thermal Ratings of the requested FacilitiesR8.2 . . .R8.2.1 Next Thermal Ratings for the requested Facilities beyond the most limiting equipmentR8.2.2 Identify the limiting equipment associated with the next Thermal Ratings of the requested Facilities These revisions are proposed by ATC because a Thermal Rating for a Facility could be based on more than one piece or type of equipment. For example, a Facility could have two switches with the same rating or two different items (breaker and relay) with the same rating. Conversely, the piece or type of equipment associated with the Thermal Rating and the next Thermal Rating could be one single item. For example, the equipment could be the line conductor, but different sections of the line conductor could have different ratings due to different ground clearances, wind exposure, or conductor types.
<p>Response: The FRSDT received many comments concerning the proposed requirement and its intent. We have revised 8.2.2 to “The Thermal Rating for the...</p>		
The Valley Group, a Nexans company	Yes	In December 2010, NERC Smart Grid Task Force published Report “Reliability Considerations from the Integration of Smart Grid”, and in it, there is an excerpt on “Integration of Smart Grid Technology into the Bulk Power System”, Section 3, page 12. In this excerpt, it is stated that Smart Grid provides the ability to create an overarching, coordinated and hierarchical approach to automation, control and effectiveness. Among examples of smart grid technologies, Dynamic Thermal Circuit Rating (DTCR) devices

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Organization	Yes or No ²	Question 1 Comment
		<p>were numbered. Although the objective of NERC Project 2009-06 is to identify the limiting component(s) and next limiting component(s) for all critical facilities, and not about Smart Grid integration; however, it should be beneficial to state a need for smart grid technologies integration, especially DTCR devices, into this NERC project. While the paramount importance is to maintain the reliability and integrity of the bulk power system, it is of equal importance to introduce reliability and economic benefits that Smart Grid technologies are bringing. Careful planning, coordination, and possibly review of the current Facility Rating Methodologies should be encouraged and introduced at present time. Static transmission line ratings, and static ratings of power system equipment in general, belong to past practices, and entities should be encouraged to embrace Smart Grid into their systems.</p>
<p>Response: Thank you for your comments. These may be considered with the next revision to this standard.</p>		
PacifiCorp	Yes	<p>PacifiCorp acknowledges that proposed Requirement R8 addresses the FERC directive in Paragraph 756. However, the Standards Drafting Team carried over from Order 693 some ambiguous language that may require clarification. Paragraph 756 directs that NERC include language requiring entities to identify the next most limiting component for facilities for which the thermal rating causes an impediment to service to “major cities or load pockets.” Requirement R8.2 necessarily contains this requirement as directed by the Commission. It is unclear to PacifiCorp what the Standards Drafting Team would define as a “major” city. Also, it is unclear whether the term “major” is intended to apply to load pockets as well and, if so, what is considered a “major” load pocket. Regardless of whether “major” applies to load pockets, further clarification also is needed regarding what is meant by the term “load pocket.” PacifiCorp requests modification of Requirement R8 to clarify this element.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for</p>		

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Organization	Yes or No ²	Question 1 Comment
<p>Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is "under the Requester's authority", minimizing interpretation issues.</p>		
American Electric Power	Yes	See response to Question 5.
Dynergy Inc.	Yes	We agree proposed R8 addresses the FERC directive; however, by including GO in R8, R7 and R8 seem redundant with respect to the GO. Suggest deleting R7 or include "subject to R1" after Generator Owner in R7. Also, R8 requires a TO to provide information to itself. Suggest deleting TO as a recipient from itself.
<p>Response: The FRSDT thanks you for your comment. Requirement R1 requires that the Generator Owner "have documentation for determining Facility Ratings". Requirement R7 requires the generation owner to "provide Facility Ratings...." There are subtle but distinct differences between R7 and R8 with respect to the GO.</p>		
MISO Standards Collaborators	Yes	<p>We propose revising the wording of Requirement R8 to more carefully refer to the Thermal Ratings of the requested Facilities: (see changes below)</p> <p>R8.1 . . .R8.1.1 Thermal Ratings for the requested Facilities</p> <p>R8.1.2 Identify the limiting equipment associated with the Thermal Ratings of the requested Facilities</p> <p>R8.2 . . .R8.2.1 Next Thermal Ratings for the requested Facilities beyond the most limiting equipment</p> <p>R8.2.2 Identify the limiting equipment associated with the next Thermal Ratings of the requested Facilities</p> <p>These revisions are proposed because a Thermal Rating for a Facility could be based on more than one piece or type of equipment. For example, a Facility could have two switches with the same rating or two different items (breaker and relay) with the same rating. Conversely, the piece or type of equipment associated with the Thermal Rating and the next Thermal Rating could be one single item. For example, the equipment could be the line conductor, but different sections of the line conductor could have different ratings due to different ground clearances, wind exposure, or conductor types.</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>For R8.2, we have four areas of concern for the second most limiting piece of equipment of a Facility. These four items are, "Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket" and they are the exact words that the commission used in FERC Order 693, paragraph 756. The SDT should apply the "equally efficient and effective" rule of thumb and clarify what "impeding service to a major city or load pocket" means. Furthermore paragraph 771 states that "... (3) for each facility, identify the limiting component and, for critical facilities, the resulting increase in rating if that component is no longer limiting". The Commission uses the word "critical facilities". We recommend that the SDT rewrite R8.2 to read; 8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested critical Facility with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket. Entities have a list of these "critical facilities" and this will ensure that Facility Ratings are used in the reliable planning and operation of the Bulk Electric System.</p>
<p>Response: The FRSDT thanks you for your comment. The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p>		
ACES Power Marketing	Yes	<p>While it likely will satisfy the FERC directive, proposed Requirement R8 is ambiguous, leaves much room for interpretation, and causes some confusion. For instance, when would an IROL be expected to have a thermal limit? Violations of IROLs by definition can</p>

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Organization	Yes or No ²	Question 1 Comment
		<p>expose a widespread area to cascading outages, uncontrolled separation or instability. When does exceeding a thermal limit ever do this? Since TTCs fluctuate based on system conditions, what studies would the limiting TTC target? Studies used to support posting ATCs/AFCs? Near-term seasonal assessment studies? Long-term transmission planning studies? Many TSPs have automated tools that recalculate TTC every hour for the next 168 hours. It would not make sense to use these hourly TTCs as they change too rapidly but we are left wandering what the drafting team had in mind. What does impeding generator deliverability and impeding service to a major city or load pocket mean? We assume that the drafting team means limits deliverability or service. Impede is a poor choice of words as all lines have impedance and, thus, impede service and deliverability. Use of a major city or load pocket is ambiguous and should be avoided. What constitutes a major city? The top 10 largest cities by population in the U.S.? The top 100 largest cities? What constitutes a large load pocket? 100 MW of load, 200 MW of load? By using ambiguous terms, there will surely be unequal enforcement of the requirement for several years until those details are worked out in the audit and enforcement processes. Now is the time to resolve these ambiguities.</p>
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is "under the Requester's authority", minimizing interpretation issues.</p>		

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Organization	Yes or No ²	Question 1 Comment
National Grid	Yes	<p>While we agree R8 meets the FERC Directive, we believe there are things that can still be done to improve the requirement.</p> <ol style="list-style-type: none"> 1. Eliminate requirement R 8.2 (reproduced below). There is a lot of ambiguity in the term "major city or load pocket" and hence the proposal to completely eliminate the requirement. 2. For R 8.1.2 "identity of the most limiting equipment of the Facilities" National Grid believes this would be applicable to each individual Normal and Emergency rating, and be required to be provided. We believe this proposed revision may have gone beyond the intent of the FERC Directive.
<p>Response: The FRSDT thanks you for your comment. The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is "under the Requester's authority", minimizing interpretation issues.</p> <p>The SDT believes the entire FAC 008-3 does not require any information beyond "Normal" and "Emergency" ratings as per Requirement R2, Part 2.4.2 and Requirement R3, Part 3.4.2.</p>		
Niagara Mohawk (National Grid Company)	Yes	<p>While we agree R8 meets the FERC Directive, we believe there are things that can still be done to improve the requirement.</p> <ol style="list-style-type: none"> 1. Eliminate requirement R 8.2 (reproduced below). There is a lot of ambiguity in the term

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Organization	Yes or No ²	Question 1 Comment
		<p>"major city or load pocket" and hence the proposal to completely eliminate the requirement.</p> <p>2. For R 8.1.2 "identity of the most limiting equipment of the Facilities" RSC believes this would be applicable to each individual Normal and Emergency rating, and be required to be provided. We believe this proposed revision may have gone beyond the intent of the FERC Directive.</p>
<p>Response: The FRSDT thanks you for your comment. The FRSDT received many comments concerning the proposed requirement and its intent. Many stakeholders believe that more clarity is necessary. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. While it may vary between different Planning Coordinators and/or Reliability Coordinators, the term "impeding generator deliverability" generally refers to the transmission facility, which is limiting the ability to deliver the generation output to the aggregate load. The FRSDT intended for impacted entities responsible for power system reliability to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities are impacted. The FRSDT believes that this language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement. A requester cannot ask for Ratings information for every Facility of another entity through Requirement R8, Part 8.2 – a requester may only ask for Ratings information for those Facilities which are impacted by one of the four conditions, which the requester has presumably determined through studies or actual operational data. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Also Requirement R8, Part 8.2 has been modified to make clear that the data being requested from the owner concerning a thermal rating of equipment within a Facility, must be from an entity for a Facility that is "under the Requester's authority", minimizing interpretation issues.</p> <p>The SDT believes the entire FAC 008-3 does not require any information beyond "Normal" and "Emergency" ratings as per Requirement R2, Part 2.4.2 and Requirement R3, Part3.4.2.</p>		

2. Do you agree with the proposed Violation Risk Factor, Time Horizon and Violation Severity Levels for requirement R8? If not, please explain why not and if possible, provide an alternative that would be acceptable to you.

Summary Consideration: Most commenters agree with the proposed VRFs, VSLs and Time Horizons. Some commenters had concerns with the use of percentages in the VSLs. The VSLs allow for the varying scenarios of non-compliance with the requirement. Since a requester may ask for multiple Facility Ratings, the requested entity may not provide all of the information (i.e. only half or 50% or the requested information). Likewise, an entity may be late in providing the information. The VSLs meet the guidelines for this type of requirement. Please keep in mind that VSLs are only applied after a violation of the requirement is found. Some commenters suggested that the VRF for R8 should be lower. The VRF for R8 matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements have the same VRF. Other commenters suggested that the Time Horizon for R8 should be Long-term Planning. The usage of the information obtained under R8 is envisioned to be the same as that obtained under R7. The Time horizons are the same for both requirements.

Minor revisions were made to the VSLs for R7 and R8 as follows:

1. The first VSL under the Lower category needs the words “and including” inserted prior to the “15 calendar days” language. The last part of the sentence should state “but missed meeting the schedules by up to and including 15 calendar days. This extra language would further clarify that if an entity reported its Facility Ratings on the 15th day, they would fall under the “Lower” VSL.
2. For the VSLs which incorporate percentages, the VSL percentages are not inclusive. The words “or equal to” should be incorporated into such VSLs. For example, the second VSL under the Lower category should state “The responsible entity provided less than 100%, but not less than or equal to 95%...” This type of change should be incorporated in all four of the VSL categories.

Organization	Yes or No ³	Question 2 Comment
FirstEnergy Solutions		FE generally finds the VSLs acceptable as written. We are abstain due to concerns we have with the proposed Requirement R6.4 and believe revision/clarifications are needed which may require conforming

³ When this column is blank, it indicates a comment that was submitted with a ballot but not via the electronic comment form. Some commenters submitted duplicate comments with their ballot and via the electronic comment form; in this case, the Yes or No column is marked with their response in the electronic comment form.

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Organization	Yes or No ³	Question 2 Comment
		changes to the VSLs.
<p>Response: The FRSDT thanks you for your comment.</p>		
<p>Manitoba Hydro Joe D Petaski Greg C. Parent S N Fernando Daniel Prowse</p>		<p>-The VRF of Medium is not appropriate for Requirement 8 and should be set to Lower.</p>
<p>Response: The FRSDT thanks you for your comment. The VRF for R8 matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements have the same VRF.</p>		
<p>GDS Associates</p>	<p>No</p>	<p>a. Development of a percentage based Violation Severity Level seems arbitrary and capricious. There is no assistance provided in understanding what constitutes a required Rating information submittal. Smaller projects with less equipment will be penalized greater.</p> <p>The VSLs allow for the varying scenarios of non-compliance with the requirement. Since a requester may ask for multiple Facility Ratings, the requested entity may not provide all of the information (i.e. only half or 50% or the requested information). Likewise, an entity may be late in providing the information. The VSLs meet the guidelines for this type of requirement. Please keep in mind that VSLs are only applied after a violation of the requirement is found.</p> <p>b. We do not see how the percentages on which the responsible entities have missed to provide the required information to the requesting entities can be estimated.</p> <p>The VSLs allow for the varying scenarios of non-compliance with the requirement. Since a requestor may ask for multiple Facility Ratings, the requested entity may not provide all of the information (i.e. only half or 50% or the requested information). Likewise, an entity may be late in providing the information. The VSLs meet the guidelines for this type of requirement.</p>

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Organization	Yes or No ³	Question 2 Comment
		<p>c. We can agree on the proposed number of days used in the VSLS criteria, but not if the schedule is entirely decided by the requesting entity.</p> <p>The requirement is written such that the requesting entity specifies when they need the information. If an entity is not able to meet the schedule, it is expected that the two entities will come to a mutual agreement on a schedule.</p>
<p>Response: The FRSDT thanks you for your comment.</p>		
Luminant Generation Company LLC	No	Comments submitted on Project 2009-06: Facility Ratings in. Overall, clarity needs to be provided on the standard prior to being able to support the proposed VRF and VSLs.
<p>Response: The FRSDT thanks you for your comment. Please see the proposed clarifying revisions in the Summary Consideration for Question 1.</p>		
Seattle City Light	No	<p>Comments submitted: Copied below for your info: We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another’s system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot. 8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket: 8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1</p>
<p>Response: The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change. The SDT recommends the use of the words “Facilities under the Requester’s authority” rather than the commenter’s term “Requester’s Facilities”. The term “Requester’s Facilities” could be interpreted as having an ownership relationship. The SDT used the term “Facilities under the Requester’s authority” to avoid that potential confusion and also ensure that there is a direct functional relationship (e.g. Planning Coordinator has a planning relationship, Transmission Operator has an operating relationship) between the Facility and the requester.</p>		

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Organization	Yes or No ³	Question 2 Comment
Ontario Power Generation Inc.	No	<p>Consistent with my comments on 2009-06 (FAC008 and FAC009), these comments are equally applicable here, since the VSLs and VRFs refer to the Requirements that require deletion or modification:</p> <ol style="list-style-type: none"> 1. OPG disagrees with the requirement to provide "Limiting Equipment" information as specified in Requirement 8.1.2. It remains unclear as to what reliability purpose would be served by the provision of this information. Maintenance of this type of information would be onerous, and particularly in light of its questionable utility, OPG sees no need to undertake such work. 2. For the same reasons listed above, Requirement 8.2 is completely unnecessary. 3. All other elements of the standard that refer to either of the above Requirements need to be deleted or amended.
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The background material provided with the posting of the standard. During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the “Emergency Rating” or “shorter term rating” as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour rating or some other value.</p>		
Consolidated Edison Co. of New York	No	<p>RELIABILITY CONCERNS: (1) Key terms and phrases are undefined, including “most limiting,” “next most limiting,” “impediment,” “impediment to generation deliverability,” “impediment to service” and “major cities or load pockets.” (2) The event graph provided along with the proposed standard fully illustrates the complication/confusion created by the proposed wording. There is a different Element and rating reported depending upon the event duration used. Each element in the graph may be the “most limiting” or “next most limiting” Element at any point, depending upon the duration selected for reporting purposes. This problem needs to be addressed. (3) There is no Guidance documents to clarify the reliability standard’s requirements and meaning. COMMENTS WITH QUESTIONS: 1. The drafting team needs to define the following terms a. “most limiting,” b. “next most limiting,” c. “impediment to generation deliverability,” d. “impediment to service,” and e. “major cities or load pockets” 2. The drafting team needs to provide guidance on the meaning, scope and use of the word “impediment” as it is used in the terms “impediment to generation deliverability,” and “impediment to service.” a. What are the limitations of any “impediment,” e.g., 0.1%, 1%, 5% or 10% of what</p>

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Organization	Yes or No ³	Question 2 Comment
		<p>measure(s), the Facility Rating? b. Is there a dead band within or threshold below which the impediment is not material, e.g., +/-5%, and beyond which it is material? c. What is the reach of any impediment, e.g. within a substation, 1 mile, 10 miles (across a load area), 100 miles (across an interface), across a Balancing Authority (NYISO), or 1,000 miles (across the Eastern Interconnection)? 3. The drafting team needs to provide guidance on the meaning, scope and use of the phrases “most limiting” and “next most limiting” Facility or Element. a. What are the timeframe (refer to event graph), rating type(s) and duration sought, e.g., normal conditions, short term or long-term exceedance? b. What is the context of the ratings sought, e.g., normal operation, N-1 contingency, with or without cooling? c. Is reporting applicable to a particular time, day, period or season, e.g., 14:00 hrs., July 6th peak, or Summer and Winter ratings? d. Is the reporting average, normalized, typical, maximum, at some temperature, e.g., 4 hr. max. rating at 86°F, 1 hr. max. normalized to 70°F, with or without forced cooling, at an 82°F cooling sink temperature (air, river or ocean)? 4. The drafting team should consider producing a Guidance Document with definitions, example uses and a Frequently Asked Questions (FAQ) section to provide the industry assistance and guidance. 5. What, if any, are respondent’s obligations under R8.2 for areas or regions where IROL’s or TTC are not limiting or are not used?</p>
<p>Response: The FRSDT thanks you for your comment. Requirement 2.3 and 3.3 both refer to the “most limiting applicable Equipment Rating”. The SDT believes that the meaning of “most limiting” is clear when read in context. Similarly, the SDT believes, ‘next most limiting’ is also clear when read in context. The SDT has responded to commenter’s suggestions for clarity involving the relationship between the Facility and the Requester, as well as clarification related to thermal capabilities of the equipment referred to in Requirement 8.2. The SDT believes that these clarifications largely address this commenter’s concerns. Requirement R2, Part 2.3 and Requirement R3, Part 3.3 both refer to the “most limiting applicable Equipment Rating”. The SDT believes that the meaning of “most limiting” is clear when read in context. Similarly, the SDT believes, ‘next most limiting’ is also clear when read in context. The SDT has responded to commenter’s suggestions for clarity involving the relationship between the Facility and the Requester, as well as clarification related to thermal capabilities of the equipment referred to in Requirement R8, Part 8.2. The SDT believes that these clarifications largely address this commenter’s concerns.</p> <p>For your suggestion regarding defining “most limiting”, etc.: The FRSDT does not believe that these terms need to be a defined term in the NERC Glossary.</p> <p>The drafting team received several suggestions to modify Requirement R8 to make it easier to determine what constitutes a major city or load pocket. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether Facilities under their authority are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. Please see the proposed clarified Requirement R8 in the Summary Consideration above.</p> <p>Guidance documents: Drafting teams are not under obligation to develop guidance documents for each standard. The incremental change to this standard is</p>		

Consideration of Comments on Facility Ratings Expansion— Project 2009-06

Organization	Yes or No ³	Question 2 Comment
related to Requirement 8, Part 8.2. The FRSDT believes that sufficient guidance has been provided in the background material of the comment form.		
ReliabilityFirst Corporation	No	<p>ReliabilityFirst generally agrees with the VRFs. ReliabilityFirst voted negative on this poll due to the VSL designations as listed below:</p> <ol style="list-style-type: none"> 1. The first VSL under the Lower category needs the words “and including” inserted prior to the “15 calendar days” language. The last part of the sentence should state “but missed meeting the schedules by up to and including 15 calendar days. This extra language would further clarify that if an entity reported its Facility Ratings on the 15th day, they would fall under the “Lower” VSL. 2. For the VSLs which incorporate percentages, the VSL percentages are not inclusive. The words “or equal to” should be incorporated into such VSLs. For example, the second VSL under the Lower category should state “The responsible entity provided less than 100%, but not less than or equal to 95%...” This type of change should be incorporated in all four of the VSL categories.
Response: The FRSDT thanks you for your comment. The FRSDT agrees and has made the proposed revisions		
Consumers Energy	No	see comments on the proposed Standard.
Response: The FRSDT thanks you for your comment. Please see response to comments on proposed standard.		
MEAG Power Municipal Electric Authority of Georgia	No	Standard language needs to be clarified as noted in our ballot submission before affirming the VRFs and VSLs.
Response: The FRSDT thanks you for your comment. Please see clarifying revisions in the Summary Consideration for Question 1.		
National Grid	No	The selection of 100% to 95%, and 95% to 90%, etc, seems arbitrary and not based on a reliability reason. It is hard to understand how one would classify whether the information provided would fall into those percentage categories and would then cause the risk to move from low to severe.
Response: The FRSDT thanks you for your comment. The VSLs allow for the varying scenarios of non-compliance with the requirement. Since a requester may ask for multiple Facility Ratings, the requested entity may not provide all of the information (i.e. only half or 50% or the requested information). Likewise, an entity may be late in providing the information. The VSLs meet the guidelines for this type of requirement. Please keep in mind that VSLs are only applied after a violation of the requirement is found.		

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Organization	Yes or No ³	Question 2 Comment
Niagara Mohawk (National Grid Company)	No	The selection of 100% to 95%, and 95% to 90%, etc, seems arbitrary and not based on a reliability reason. It is T hard to understand how one would classify whether the information provided would fall into those percentage categories and would then cause the risk to move from low to severe.
<p>Response: The FRSDT thanks you for your comment. The VSLs allow for the varying scenarios of non-compliance with the requirement. Since a requester may ask for multiple Facility Ratings, the requested entity may not provide all of the information (i.e. only half or 50% or the requested information). Likewise, an entity may be late in providing the information. The VSLs meet the guidelines for this type of requirement. Please keep in mind that VSLs are only applied after a violation of the requirement is found.</p>		
Pepco Holdings Inc	No	The time horizon for supplying the limiting component should be in the planning horizon.
<p>Response: The FRSDT thanks you for your comment. The usage of the information obtained under R8 is envisioned to be the same as that obtained under R7. The Time horizons are the same for both requirements.</p>		
American Electric Power	No	The Violation Risk Factor for 8.2 is the same as that required for 8.1. The real-time reliability need for the data required in 8.2 is questionable, at best. Since this data need not be supplied prior to 30 days after requested, it is inconsistent with a VRF of “Medium”. Rather for 8.2 it should be “Lower”.
<p>Response: The FRSDT thanks you for your comment. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The VRF for R8 applies to all parts and subparts of R8 and also matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements have the same VRF.</p>		
Occidental Chemical	No	The VRF for R 8.2 should be “Lower” since the data is not required for real time operations as is R 8.1, which has a VRF of “Medium.”
<p>Response: The FRSDT thanks you for your comment. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The VRF for R8 applies to all parts and subparts of R8 and also matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements have the same VRF.</p>		
Manitoba Hydro	No	The VRF should be Lower. Requirement 8.2 only requires the entity to provide information, and this

Consideration of Comments on Facility Ratings Expansion— Project 2009-06

Organization	Yes or No ³	Question 2 Comment
		information is the next most limiting element not the most limiting element.
<p>Response: The FRSDT thanks you for your comment. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The VRF for R8 applies to all parts and subparts of R8 and also matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements have the same VRF.</p>		
Indeck Energy Services	No	<p>The VSL's are focused on a TO with numerous ratings to provide. A GO might only have one. The GO violation would always be Severe. The number of ratings not provided should be an "either or" with the percentage, such as: Lower VSL: The responsible entity failed to provide more than 5 Ratings or provided less than 100%, but not less than 95% of the required Rating information to all of the requesting entities. Moderate VSL: The responsible entity failed to provide more than 10 Ratings or provided less than 100%, but not less than 90% of the required Rating information to all of the requesting entities. High VSL: The responsible entity failed to provide up to 15 Ratings or provided less than 100%, but not less than 85% of the required Rating information to all of the requesting entities. Lower VSL: The responsible entity failed to provide up to 20 Ratings or provided less than 85% of the required Rating information to all of the requesting entities.</p>
<p>Response: The FRSDT thanks you for your comment. Note that the VSLs only provide a starting point for the determination of a penalty or sanction. There are many other mitigating/aggravating factors used to determine the actual penalty or sanction.</p>		
Tri-State G&T	No	<p>There is room for confusion where the VSLs for R7 and R8 use the phrase "missed meeting the schedules." Depending on the intent, it should perhaps be changed to "missed meeting one or more schedules" or "missed meeting all of the schedules" in each of the VSLs.</p>
<p>Response: The FRSDT thanks you for your comment. Because the VSLs contain the phrase, "requesting entities" there should be no confusion. If there was only one requesting entity, there should be only one schedule – but if there were 10 requesting entities, there should be 10 schedules.</p>		
NERC Standards Review Subcommittee	No	<p>We agree that the "Medium" rating for R8.1 is correct since it is due immediately. However, the VRF for R8.2 should be "Lower" since the data is not required immediately for real-time operations.</p>
<p>Response: The FRSDT thanks you for your comment. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The VRF for R8 applies to all parts and subparts of R8 and also matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements</p>		

Consideration of Comments on Facility Ratings Expansion— Project 2009-06

Organization	Yes or No ³	Question 2 Comment
have the same VRF.		
Seattle City Light	No	<p>We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another’s system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot.8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1</p>
<p>Response: The FRSDT thanks you for your comment. The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change.</p>		
BGE	Yes	
Bonneville Power Administration	Yes	
Clark Public Utilities	Yes	
Dominion	Yes	
East Kentucky Power Cooperative	Yes	
Exelon	Yes	
Georgia Transmission	Yes	

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Organization	Yes or No ³	Question 2 Comment
Corporation		
Imperial Irrigation District	Yes	
Luminant Power	Yes	
New Harquahala Generating Co.	Yes	
New York Power Authority	Yes	
Oklahoma Municipal Power Authority	Yes	
Pacific Gas & electric Company	Yes	
PacifiCorp	Yes	
Public Service Enterprise Group	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Generation (SCG) Technical Services	Yes	
Southern Company Transmission	Yes	
SPP Reliability Standards Development	Yes	
SRP	Yes	
United Illuminating Company	Yes	
We Energies	Yes	

Consideration of Comments on Facility Ratings Expansion— Project 2009-06

Organization	Yes or No ³	Question 2 Comment
Xcel Energy	Yes	
American Transmission Company, LLC	Yes	ATC agrees, however, believes the Violation Risk Factor for requirement 8 should be changed to “Low” and the Time Horizon for requirement 8 should be “Planning”. Information pertaining to a second limit is informational because an operator at the desk cannot act on this information without obtaining additional information or technical support. Furthermore, the fact that the information must be specifically requested validates a lower risk level.
<p>Response: The FRSDT thanks you for your comment. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The VRF for R8 applies to all parts and subparts of R8 and also matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements have the same VRF.</p> <p>The usage of the information obtained under R8 is envisioned to be the same as that obtained under R7. The Time horizons are the same for both requirements.</p>		
MISO Standards Collaborators	Yes	We agree, however, the Violation Risk Factor for requirement 8 should be changed to “Low” and the Time Horizon for requirement 8 should be “Planning”. Information pertaining to a second limit is informational because an operator at the desk cannot act on this information without obtaining additional information or technical support. Furthermore, the fact that the information must be specifically requested validates a lower risk level.
<p>Response: The FRSDT thanks you for your comment. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The VRF for R8 applies to all parts and subparts of R8 and also matches the VRF for R7. The FERC approved guidelines for VRFs require that similar requirements have the same VRF.</p> <p>The usage of the information obtained under R8 is envisioned to be the same as that obtained under R7. The Time horizons are the same for both requirements.</p>		

3. Do you agree with the proposed Measure M8? If not, please explain why not and if possible, provide an alternative that would be acceptable to you.

Summary Consideration: The majority of commenters agree with the Measure M8. A couple of commenters had suggestions for including language that limits the scope to requested data and other specific language. The FRSDT believes that the phrase “in accordance with Requirement R8” contained in M8 is sufficient language to tie the measure to the requirement and provide the linkage suggested.

Organization	Yes or No ⁴	Question 3 Comment
Louisville Gas and Electric Co.		The Measurement (M8) does not clarify what else constitutes “shall have evidence” other than the dated electronic note. : M8. Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R87.
<p>Response: The FRSDT thanks you for your comment. The intent of the measure is to provide guidance as to the type of evidence that is necessary for the requirement. The phrase “or other comparable evidence” provides an entity the flexibility to develop other types of evidence that may be acceptable.</p>		
U.S. Bureau of Reclamation – Martin Bauer P.E.		<p>The proposed language of parts 8.2, 8.2.2, and M8 is ambiguous and does not make clear the intent of the proposed Requirement 8, which is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another’s system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, we have provided proposed alternative language for parts 8.2, 8.2.2, and M8 which we believe clarifies the intent, while not changing the actual requirements.</p> <p>M8. Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings, identity of limiting equipment, and if requested, thermal rating of the equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and</p>

⁴ When this column is blank, it indicates a comment that was submitted with a ballot but not via the electronic comment form. Some commenters submitted duplicate comments with their ballot and via the electronic comment form; in this case, the Yes or No column is marked with their response in the electronic comment form.

Consideration of Comments on Facility Ratings Expansion— Project 2009-06

Organization	Yes or No ⁴	Question 3 Comment
		Transmission Operator(s) in accordance with Requirement R87.
<p>Response: The FRSDT thanks you for your comment. The FRSDT has made clarifying revisions to the requirement. Please see the proposed revisions in the Summary Consideration of Question 1.</p>		
Xcel Energy	No	
GDS Associates	No	a. The applicability to the GO should not be stated in parenthesis. We suggest rewording such as “Each Transmission Owner and Generator Owner shall have [...]”
<p>Response: The FRSDT thanks you for your comment. The style incorporated is necessary to indicate that this only applies to a GO who has Facilities applicable to Requirement 2. R8 is not applicable to all GOs.</p>		
East Kentucky Power Cooperative	No	EKPC does not believe that the identity of the limiting equipment is necessary to provide a reliable BES. Therefore, this information should not be required in R8 or M8.
<p>Response: The FRSDT thanks you for your comment.</p>		
Indeck Energy Services	No	M8 fails to indicate that the TO or GO only need evidence of responding to specific requests.
<p>Response: The FRSDT thanks you for your comment. The phrase “in accordance with Requirement R8” provides sufficient indication that the TO or GO only has to provide evidence upon request.</p>		
Ameren	No	Ratings (normal and emergency) should be provided by the requested date. The limiting equipment of the facility rating should be made available upon request, as needed for reliability concerns. The second limit and the corresponding limiting equipment should also be made available upon request, as needed for reliability concerns.
<p>Response: The FRSDT thanks you for your comment. The phrase “in accordance with Requirement R8” is sufficient language to tie the measure to the requirement and provide the linkage that you suggest.</p>		
Pepco Holdings Inc	No	The measure should take into account if the requesting entity does not require the limiting components or the next limiting rating.
<p>Response: The FRSDT thanks you for your comment. The phrase “in accordance with Requirement R8” is sufficient language to tie the measure to the</p>		

Consideration of Comments on Facility Ratings Expansion— Project 2009-06

Organization	Yes or No ⁴	Question 3 Comment
requirement and provide the linkage that you suggest.		
Seattle City Light	No	<p>We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another’s system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot.8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1</p>
<p>Response: The SDT thanks you for the suggestion, and agrees that the suggestion is indeed a language clarification, and is not a change of intent. Therefore, with minor modification, the SDT accepts the proposed change.</p>		
American Transmission Company, LLC	Yes	
BC Hydro and Power Authority	Yes	
BGE	Yes	
Bonneville Power Administration	Yes	
Clark Public Utilities	Yes	
Dominion	Yes	
Exelon	Yes	

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Organization	Yes or No ⁴	Question 3 Comment
Georgia Transmission Corporation	Yes	
Imperial Irrigation District	Yes	
Luminant Power	Yes	
Manitoba Hydro	Yes	
MISO Standards Collaborators	Yes	
National Grid	Yes	
NERC Standards Review Subcommittee	Yes	
New Harquahala Generating Co.	Yes	
New York Power Authority	Yes	
Niagara Mohawk (National Grid Company)	Yes	
Oklahoma Municipal Power Authority	Yes	
PacifiCorp	Yes	
Public Service Enterprise Group	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Generation (SCG) Technical Services	Yes	

Consideration of Comments on Facility Ratings Expansion— Project 2009-06

Organization	Yes or No ⁴	Question 3 Comment
Southern Company Transmission	Yes	
SPP Reliability Standards Development	Yes	
SRP	Yes	
Tri-State G&T	Yes	
United Illuminating Company	Yes	
We Energies	Yes	
American Electric Power	Yes	M8 is consistent with R8, but this consistency should not be confused with the reliability need for the data related to R8.2, which is questionable.
Response: The FRSDT thanks you for your comment.		
Dynegy Inc.	Yes	We agree; however, similar to our comment in #1 above, M8 requires a TO to provide information to itself.
Response: The FRSDT thanks you for your comment. M8 only requires a TO to provide data to itself if it makes a request of itself.		

4. Do you agree with the proposed Implementation Plan for FAC-008-3, Facility Ratings? If not, please explain why not and if possible, provide an alternative that would be acceptable to you.

Summary Consideration: The majority of commenters agree with the implementation plan. One commenter suggested that NERC provide guidance on how to handle certain situations. The FRSDT maintains that the requirements are written to allow entities flexibility in determining their Facility Ratings Methodology and the subsequent Facility Ratings. The requirements allow for entities to handle both common and unique situations without being prescriptive. Another commenter suggested changing the effective date to match the end date of a NERC Alert relating to FAC-008. The FRSDT believes that the requirements under FAC-008-3 are not onerous and that entities are performing the work today that will be required under FAC-008-3.

Organization	Yes or No	Question 4 Comment
SRP	No	NERC does not specify how to handle the common situation where several switches and breakers in a substation bay have the same rating. Do you pick one 3000 Amp breaker, and the 3000 Amp switch next to it is “second most limiting,” or do you group all of the 3000 Amp devices as most limiting? When clearance to ground limits a line rating in a certain span, the next upgrade could be a nearby span, and could only be slightly higher. Such results would not provide a good gauge of the cost of a meaningful increase in the line rating. An increase in one line rating wouldn’t necessarily add to an IROL (Interconnection Reliability Operating Limit) or TTC (Total Transfer Capability). Extensive power flow, stability and voltage studies are usually needed to know that.
<p>Response: The FRSDT thanks you for your comment. The requirements are written to allow entities flexibility in determining their Facility Ratings Methodology and the subsequent Facility Ratings. The requirements allow for entities to handle both common and unique situations without being prescriptive.</p>		
Seattle City Light	No	We recognize that NERC is under a time constraint to file a revised standard with FERC, but we believe that the proposed language of parts 8.2 and 8.2.2 is ambiguous and does not make clear the intent of the proposed Requirement 8, which we believe is that the requesting party must demonstrate an impact on their system for ONLY a thermal limit of a Facility on another’s system. Because of this ambiguity and the potential for misunderstanding of Requirement 8, and in spite of the time constraint NERC is faced with, we are voting NO on the current version of the standard. However, we have provided proposed alternative language for parts 8.2 and 8.2.2, which we believe clarifies the intent, while not changing the actual requirements. We believe this proposed language is clarifying in nature and not a substantive change. Therefore a recirculation ballot, rather than another successive ballot could be conducted. If this language, or similar clarifying language, is adopted by the drafting team we would vote in the affirmative for the proposed standard in a recirculation ballot.8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility that has equipment with a Thermal Rating that limits the Requester’s Facility by creating an

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Organization	Yes or No	Question 4 Comment
		Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:8.2.2. The equipment’s Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1
<p>Response: The FRSDT thanks you for your comment. Please see responses to your similar comments above. The team adopted your suggestion and added the word, “Thermal” for improved clarity.</p>		
American Electric Power	Yes	
American Transmission Company, LLC	Yes	
BGE	Yes	
Bonneville Power Administration	Yes	
Clark Public Utilities	Yes	
Dominion	Yes	
Dynergy Inc.	Yes	
East Kentucky Power Cooperative	Yes	
Exelon	Yes	
GDS Associates	Yes	
Georgia Transmission Corporation	Yes	
Imperial Irrigation District	Yes	
Luminant Power	Yes	

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Organization	Yes or No	Question 4 Comment
Manitoba Hydro	Yes	
MISO Standards Collaborators	Yes	
National Grid	Yes	
NERC Standards Review Subcommittee	Yes	
New Harquahala Generating Co.	Yes	
New York Power Authority	Yes	
Niagara Mohawk (National Grid Company)	Yes	
Oklahoma Municipal Power Authority	Yes	
Pepco Holdings Inc	Yes	
Public Service Enterprise Group	Yes	
South Carolina Electric and Gas	Yes	
Southern Company Generation (SCG) Technical Services	Yes	
Southern Company Transmission	Yes	
SPP Reliability Standards Development	Yes	
Tri-State G&T	Yes	

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Organization	Yes or No	Question 4 Comment
United Illuminating Company	Yes	
Xcel Energy	Yes	
PacifiCorp	Yes	<p>PacifiCorp does not believe that the proposed Implementation Plan, which provides for a 12-month period before FAC-008-03 becomes effective, allows for sufficient time for entities to update their Facility Rating Methodology and their associated Facility Ratings. The Implementation Plan for this standard should be tied to the implementation of the NERC Alert for FAC-008. The Implementation Plan should reflect that the effective date for compliance with this standard is 12 months after the close of the activities required under that NERC Alert (currently scheduled for December 31, 2013). While PacifiCorp understands that the NERC Alert is not equivalent to a mandatory Reliability Standard, it nonetheless imposes significant compliance and operational burdens on registered entities and, only after the close of those activities responsive to the NERC Alert, can entities properly comply with the modifications in FAC-008-3 directed by the Commission.</p>
<p>Response: The FRSDT thanks you for your comment. The FRSDT believes that the requirements under FAC-008-3 are not onerous and that entities are performing the work today that will be required under FAC-008-3.</p>		
Ameren	Yes	<p>The implementation plan as proposed would be acceptable if the requirements of the proposed standard would be modified, as discussed in items 1 and 3 above and below in item 5.</p>
<p>Response: The FRSDT thanks you for your comment. Please see responses to your other comments.</p>		

5. If you have any other comments related to the FERC directive (paragraphs 756 and 771) and this Supplemental SAR that you have not already provided in response to the questions above, please provide them here.

Summary Consideration: Many commenters reiterated their suggestions for improvement to the Standard that they provided in the questions above. Several commenters requested clarification or edits to the standard which are outside of the scope of the Supplemental SAR.

Organization	Question 5 Comment
Ameren	<p>We would agree to provide limited additional rating information for reliability needs, but most of the reasons identified by the FERC and the SDT are not for reliability. We agree that an IROL is a reliability need and additional rating and equipment information may be appropriate for discussion to formulate corrective plans to mitigate IROLs. However, we are not convinced that we need a standard to provide that information as it can be readily obtained through existing planning and operating channels, upon request. We are in favor of increased situational awareness and providing operators with information that they need to maintain system reliability, but we are also aware that too much information may be overwhelming, and all ratings data for all equipment is not needed for system operation. We have discussed these proposed additional requirements with our Transmission Operations and Operations Planning personnel, and we all agree that this additional ratings information is not needed to maintain or increase situational awareness or to develop effective Operating Plans or Planning Assessments prior to real-time operations. We do not see a need to provide second limit information in the operating horizon to address TTC calculations, generator deliverability concerns, or transmission service to load pockets. Limits to TTC may not be a reliability concern unless the incremental transfer capability is negative or a very low value. Generator deliverability and available transmission services are market products, and processes and procedures are in place for market participants to address those issues. Low values of either quantity indicate congestion concerns between the generators and the LSEs rather than reliability issues. In addition, from our perspective, system upgrades to allow the second limits to become the most limiting facilities typically cannot be completed in the operating horizon. Therefore, we do not believe that second limits need to be provided in the operating horizon. We listened to the NERC Webinar presented by the SDT and appreciated the opportunity to submit questions, but we were not convinced that there is a reliability need for all the reasons given. It appears that the SDT is still attempting to build a case to support the FERC directives to provide the additional ratings information. However, we view this proposal as a repackaged version of an earlier proposal. The industry has voiced its opinion on the need for the additional rating information on several occasions now, and each time the industry has overwhelmingly said “No, these requirements are not needed to maintain reliability”. We see no reason to change our earlier position, and therefore cannot support the latest proposed revisions to FAC-008.</p> <p>Below are additional reasons why the most limiting equipment and the second most limiting equipment and ratings should not be provided, except upon request:</p> <ol style="list-style-type: none"> 1. There is no need to provide the most limiting equipment information for all facilities as the overwhelming majority of these

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	<p>facilities would rarely result in an IROL or SOL.</p> <p>2. The Reliability Coordinator, Transmission Operator, and Planning Coordinator need to honor the existing ratings that are in place, and not worry about the second limits. The revised standard PRC-023 should eliminate relay limits as the first or second limits for nearly all facilities, so the concern for the system falling apart for single contingency events should be significantly reduced.</p> <p>3. Providing this second limit information would be another record keeping nightmare for the Reliability Coordinator, Transmission Operator, and Planning Coordinator, as some of these entities can barely manage the ratings information that they presently have.</p> <p>4. When IROL or SOL are identified, this should encourage discussion between the Reliability Coordinator, Transmission Operator, and Planning Coordinator and the local transmission owner or local transmission operator. These entities should work together to understand the System requirements and develop mitigation, if needed. Providing this additional rating information to entities prior to its request and without the benefits of discussion encourages operating decisions to be made unilaterally.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The FRSDT has made clarifying revisions to Requirement R8, Part 8.2 and its subparts that address your comments. Please see proposed revisions in the Summary Consideration for Question 1. The FERC directives in Order 693 provide for inclusion of most of your points 1-4 above. The FRSDT believes that the Requirement R8 meets the directives. The information contained in Requirement R8, Part 8.2 and its subparts are only to be provided upon request.</p>	
<p>American Electric Power</p>	<p>The data required in R8.1.1 (Facility rating(s)) is essential to operate the BES reliably in real-time. However, the identification of that equipment in R8.1.2 has limited value in real time operation. Although consistent with the FERC Orders referenced with the related SAR, the identification of the “next most” limiting equipment, and the associated equipment rating is not useful in real-time operation, and could - if misunderstood - be detrimental to the reliability of the BES. Knowledge only of the rating of the “next most limiting equipment” alone is insufficient to be useful in real-time operation. To be useful other information, such as the time for which the next most limiting equipment might govern the Facility Rating rather than the most limiting equipment, must be known. However, if that time information was provided, that knowledge effectively assigns a ‘short term’ rating to the Facility in question. If that were the objective of the FERC Orders, then greater clarity and understanding and potential usefulness could have been achieved by simply requiring a short term rating (i.e. a 1-hour rating for a Facility that meets the definition contained in the preamble to R8.2). In the planning horizon, all the rating of equipment that comprises a Facility will be known, or become known, as a natural part of the planning process. Therefore, a Requirement calling for this information is at best, of minimal value. Despite these stated reservations, the SDT has provided the most benign method to respond to the FERC Orders.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires</p>	

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Organization	Question 5 Comment
	<p>the inclusion of the topics of your comments. The background information contained in the last posting provides the following:</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the "Emergency Rating" or "shorter term rating" as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour rating or some other value.</p>
<p>Bonneville Power Administration</p>	<p>There are several additional edits needed to the current draft of FAC-008-3 that would remove confusion or increase understanding. These are as follows:</p> <p>In A.5 - Define the acronym BOT;</p> <p>In B.R8 and B.R3 - International Council on Large Electric Systems (CIGRE) should be replaced with International Electrotechnical Commission (IEC) or removed and left with IEEE only as an example. Although CIGRE performs studies and provides recommendations the standards are developed in IEC.</p> <p>In M4 - (Revise) Each Transmission Owner shall... (to) Each Transmission or Generator Owner shall... and remove the second sentence which is a repetitive statement already covered by the first sentence. There is a mixed use of reference to requirements as R(number) or just a number.</p> <p>For consistency:</p> <p>In M4 - Change ... accordance to Requirement 4 to ... accordance to Requirement R4</p> <p>In M5 - Change ... accordance to Requirement 5 to ... accordance to Requirement R5</p> <p>IN M6 - Change ... R2 and R3 (Requirement 6) to ... R2 and R3 and R6</p>
<p>Response: The FRSDT thanks you for your comment. Your comments are outside of the scope of the Supplemental SAR. These will be considered with the next revision to FAC-008.</p>	
<p>Brazos Electric Power Cooperative</p>	<p>From a reliability perspective, demonstrating that facility ratings do not exceed the rating of the most limiting component per Requirement 1.2 is sufficient. Even though the SDT has developed what some may consider a reasonable compromise by requiring identification of the second most limiting component, it is not clear how this results in a more reliable system. Some entities might be interested in the second most limiting component in order to know how much the rating can be increased. But this is more of an economic evaluation when developing a specific project rather than a reliability issue. The</p>

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Organization	Question 5 Comment
	<p>proposed standard lacks clarity. For example, part of the purpose from FERC 693 was to ‘identify the limiting component(s) and define the increase in rating based on the next limiting component(s) for all critical facilities’. How does the proposed requirement give an entity guidance on how to detail the increase and what are considered ‘all critical facilities’? Is simply having it in the MLSE sufficient?</p>
	<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The FRSDT has made clarifying revisions to the proposed standard. Please see proposed revisions in the Summary Consideration under Question 1. The background information contained in the last posting provides the following reliability need for the proposed requirement:</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the “Emergency Rating” or “shorter term rating” as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour rating or some other value.</p>
CenterPoint Energy	<p>R8.1.2 requires Transmission Owners and applicable Generator Owners to provide the “Identity of the most limiting equipment of the Facilities (as scheduled by the requesting entities)”. The identification of the most limiting equipment of the Facilities is not part of the typical planning process; that is, this information is not submitted for the development of steady-state planning models. In addition, commercially available power system planning software programs do not accept such data. CenterPoint Energy recommends that the identification of the most limiting equipment of the Facilities be provided only upon request and within 30 days of a request. This will result in R8.1: “Facility Ratings as scheduled by the requesting entity”, R8.2: “Identity of the most limiting equipment of the Facilities as requested within 30 days (or a later date if specified by the requester)”, and R8.3: “Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket: 8.3.1. Identity of the existing next most limiting equipment of the Facility 8.3.2. The Equipment Rating for the next most limiting equipment identified in Requirement R8, Part 8.3.1.”</p>
	<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires</p>

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	<p>the inclusion of the topics of your comments. The SDT believes that providing the identity of the most limiting element was not an onerous requirement because it must be known to establish the limit. Furthermore, the standard already requires the owner to recognize the most limiting element in establishing the Facility Rating. The FRSDT has made clarifying revisions to Requirement R8, Part 8.2 and its subparts that address your comments. Please see proposed revisions in the Summary Consideration for Question 1.</p>
<p>City of Grand Island - Jeff Mead</p>	<p>The "second" limiting factor is to satisfy scenarios based on day ahead modeling. Changing to the second rating isn't practical in real time and thus not a benefit to BES reliability. We already have emergency limits states, so use that.</p>
	<p>Response: The FRSDT thanks you for your comment. The SDT's scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers.</p>
<p>Clark Public Utilities</p>	<p>Please add a Version History box to the bottom of this proposed standard clearly stating that it is a complete revision, absorbing facility rating requirements from FAC-008-01, FAC-009-01, FAC-008-2. There is a similar occurrence in the proposed PRC-005-2 revision. This provides a confirmation of the retirement of these other standards and leaves no room for doubt.</p>
	<p>Response: The FRSDT thanks you for your comment. These items are contained in the Implementation plan. We will ask staff to add the version history table to this standard.</p> <p>FAC-008-01— Facility Ratings Methodology and FAC-009-01 — Establish and Communicate Facility Ratings, and FAC-008-2 – Facility Ratings, should all be retired when FAC-008-03 becomes effective. (While FAC-008-2 was approved in 2010, it has not yet become effective in any jurisdiction. Once approved, FAC-008-3 will be filed for approval with applicable regulatory and governmental authorities; FAC-008-2 will not be filed for approval.)</p>
<p>Cleco Power - Michelle A Corley;Stephanie Huffman;Robert Hirschak</p>	<p>Cleco is not comfortable with some of the terms used in the draft standard. In R1.1, R2.2, and R3.2, the standard requires the documentation shall contain assumptions used to rate the facility. If an entity uses manufactures nameplate ratings than there are no assumptions established. What happens if an entities assumptions in the eyes of an auditor are not adequate? Also, what is meant by "engineering analyses" in R1.1, R2.1, and R3.1.</p>
	<p>Response: The FRSDT thanks you for your comment. Even when using manufacturer's ratings, one must consider ambient conditions that change, the specific application and equipment condition. The adequacy of your assumptions must be defensible. Your support must be consistent with at least one of the following: equipment manufacturer, industry standards or test results. Engineering analysis is not required in the standard,</p>

Organization	Question 5 Comment
	<p>but is allowed. If an entity wishes to run studies or create detailed models for analysis that is acceptable.</p>
<p>East Kentucky Power Cooperative</p>	<p>It is not clear how requiring identification of the most limiting component and the second most limiting component results in a more reliable system. The identity of these components may vary over a range of ambient temperatures and network topology conditions. It would be nearly impossible to capture this information in a static published document for all possible system operating conditions. Furthermore, the time and effort involved in identifying and documenting the increase in Facility Ratings based on the second most limiting component outweighs the benefits of knowing this information. From a reliability perspective, demonstrating that Facility Ratings do not exceed the rating of the most limiting component per Requirement 1.2 is sufficient. The system will be operated using these Facility Ratings to maintain system reliability. Some entities might be interested in the second most limiting component in order to know how much the rating can be increased. But this is more of an economic evaluation when developing a specific project rather than a reliability issue, and therefore should not be a requirement included in a Reliability Standard. Another issue with Requirement 8 is that the terms "most limiting equipment" and "next most limiting equipment" are not well defined, particularly when taken in conjunction with paragraph 76 of FERC's September 16, 2010 Order. The example given in that paragraph seems to indicate that the most limiting equipment is the component that is limiting for normal conditions, whereas the next most limiting equipment is the component that is limiting for contingency conditions. This does not appear to be the intent of Requirement 8. Clarifying language is necessary to eliminate the confusion.</p>
	<p>Response: The FRSDT thanks you for your comment. The SDT's scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The FRSDT has made clarifying revisions to the proposed standard. Please see proposed revisions in the Summary Consideration under Question 1. The background information contained in the last posting provides the following reliability need for the proposed requirement:</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the "Emergency Rating" or "shorter term rating" as an 8-hour rating, others may elect to use a 4-hour rating,</p>

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	<p>and some a 1-hour rating or some other value.</p>
<p>Entergy Services, Inc. - Joel T Plessinger; Edward J Davis; Terri F Benoit</p>	<p>We recommend that radially operated transmission facilities be excluded from this standard and that exclusion be accomplished in the Applicability section with the following change: 4.1. Transmission Owner (radially operated transmission facilities excluded) 4.2. Generator Owner (radially operated transmission facilities excluded)</p>
<p>Response: The FRSDT thanks you for your comment. We will forward your comment, which is asking for a revision to the standard that is outside the scope of this project, for inclusion in the NERC Issues Database for future consideration.</p>	
<p>GDS Associates</p>	<p>a. Title o The title of proposed version 3 of the standard states simply “Facility Rating” while the current FAC-008-1 is defined as the “Facility Rating Methodology”. We agree on this if there is a reason to combine the two FAC-008 and FAC-009 altogether, otherwise the title should be kept the same.</p> <p>b. Requirement R1 o While it is indicated that the line of demarcation between generation facilities and transmission facilities is the step up transformer, the equipment after the generator step up transformer is usually considered, and rightfully so, a generator lead. The unilateral assertion that equipment after the generator step up transformer be considered transmission type equipment is incorrect. This sets up a situation where all Generator Owners would be seen as a Transmission Owners, which is not proper. o The main step-up transformer is not an appropriate reference in the standard. Although FR SDT have previously agreed that “the main step up transformer may not be the point of interconnection”, and explained that the R1 and R2 should be considered together as “R1 relates to the electrical rating of the generator and R2 relates to transmission type equipment (if owned by the GO) from the end point in R1 to the point of interconnection”, this would not support the main purpose of the standard as to be generally applicable on all and any of the various generation facility topologies. While in R1 the GO is required to have “documentation for determining the Facility Ratings”, R2 requires the GO to have “a documented methodology for determining Facility Ratings (Facility Rating Methodology)”. In other words R1 it seems to require the actual Facility Ratings along with the premises related to how these were determined including the methodology, while R2 requires only the methodology. FR SDT’s justification is in contradiction with the language used. We suggest rewording both requirements R1 and R2 as to reference only the point of interconnection and not some specific equipment. o Why is nameplate rating left out of the first bullet in R1.1 but included in the first bullet of R2.1? Is this an indication that nameplate data is not a valid rating methodology? Are the rating methodologies not left to the entity to determine? o What is meant by engineering analyses? This term is very broad and can be interpreted multiple ways. Would this not add confusion to the Audit process as different Regions interpret engineering analyses in different ways? Could this not bring about unequal enforcement?</p> <p>c. Requirement R2 o While R1 references ANSI and IEEE, requirement R2 references IEEE and CIGRE standards. Even though, as explained by the FR SDT, “ANSI/IEEE/GIGRE, etc, are examples and are meant to provide flexibility” the</p>

Organization	Question 5 Comment
	<p>language of the standard should not be ambiguous or to reflect a selective and impartial approach. We suggest that any reference to technical standards to be provided such as “[...] industry standards (e.g. Institute of Electrical and Electronic Engineers (IEEE) standard / International Council on Large Electric Systems (CIGRE) standards / American National standard Institute (ANSI) standards, etc.)”.</p> <ul style="list-style-type: none"> o Why isn’t the verbiage in Requirement 2.1 first bullet carried throughout the document (R2.2.2 & R3.2.2)? o Second bullet on R2.1 would detail the acronym for IEEE while the first reference of these standards in R1.1 is inadvertently missing this. Generally, the acronyms are explained at their first use in the text of the document. Please see also prior comment and correct the language accordingly. o What determines the average temperature at 2.2.3? How many years of data must be analyzed to provide an average? How are unusual events or variations handled? o We assume that the details pertaining the ambient conditions at 2.2.3 are meant to widen and clarify to which extent these should be considered, however we believe that the statement “[...] as they vary in real-time)” would rather confuse the GO as they may figure the likelihood of a dynamic approach. We suggest rephrasing such as “Ambient conditions (as considered by the Generator Owner based upon local conditions or / and industry standards)” o Although the footnote 1 is to serve as an example for what type of operating limitations to be considered, we believe that this can generate confusion. For instance the GO can understand that is required to consider various operating limits determined by any equipment temporarily taken out of service. While we believe that FR SDT has not envisioned this approach, we suggest deleting the word “temporary” from the footnote. o We consider that the language used at 2.4 is not the best choice. We suggest rephrasing this as follows: "2.4. The process by which the Rating of equipment that comprises a Facility is determined reflecting all of the following: 2.4.1. The equipment addressed including, but not be limited by the conductors, transformers, relay protective devices, terminal equipment, series and shunt compensation devices, etc. 2.4.2. The corresponding equipment Rating characterized at a minimum, by its Normal and Emergency Ratings (or Continuous / Shorter Term Ratings)" <p>d. Requirement R3</p> <ul style="list-style-type: none"> o See R1, R2 comment pertaining the standards reference. o See R2 comment pertaining the ambient conditions o See R2 comment pertaining the operating limitations o We consider that the language used at 3.4 is not the best choice. See comment and suggested changes at 2.4 <p>e. Requirement R4</p> <ul style="list-style-type: none"> o Not sure why the GO is required to make available the documentation for determining the Facility Ratings along with the methodology, while the TO is required to provide only the methodology. o The number of calendar days (21) to provide information is unusual. Most Standards have a period of 30 or 45 calendar days. Should there be consistency amongst all Standards? Would the change from 15 to 21 to 30 impact reliability? <p>f. Requirement R5, R6, R7, R8</p> <ul style="list-style-type: none"> o It seem that there is some overlap in between this standard and FAC-009-1
	<p>Response: The FRSDT thanks you for your comment. FAC-008-3 is a revision which includes FAC-008-1, FAC-008-2 and FAC-009-1. These three standards will be retired upon adoption of FAC-008-3 (see Implementation Plan). Requirements 5-R7 were mapped from FAC-009-1 into FAC-008-2 and subsequently FAC-008-3. Requirement R8 is a new requirement. The comments pertaining to R1-R6 are outside the scope of this Supplemental SAR. Your suggestions for improvement to R1-R6 will be considered with the next revision to the standard.</p>

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Georgia Transmission Corporation	<p>A. The follow comment uses the Comment form example definitions and Diagram 1 labeling from the Reliability Objective Discussion section - labeling of point (E2) and (E3) was added to Diagram 1 for clarity. We believe that the intent of the Directive’s requirement, as clarified in the September 16, 2010 Order, is to identify situations where an increased short term or emergency rating of equipment 3 could result in equipment 2 becoming the limiting component in the short term. In that case the identity of both equipments and their ratings, (E3) continuous rating and (E2) shorter term rating, would seem to meet the Directive’s clarified requirement. In cases where the limiting equipment’s continuous rating is equal to its emergency rating (equipment 3 blue curve is a straight line) there would not be a need to specify a second component. The “Reliability Objective Discussion” and R 8.2.2 goes much further by suggesting that four data points are required being the continuous and emergency ratings for limiting and next most limiting equipment.</p> <p>B. The R8 requirement does reflect the Directive however we believe that item (3) and item (4) are undefined terms.</p>
<p>Response: The FRSDT thanks you for your comment. A. Requirement R8, Part 8.2.2 has been revised by replacing “Equipment” with “thermal” ratings. If you have multiple sets of ratings, then it is expected that the information requested under Requirement R8, Part 8.2.2 will be for each rating that is requested.</p> <p>B. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities are impacted. This will provide better guidance with respect to “major load centers” as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. The FRSDT chose this specific language because the entities listed do not necessarily own Facilities. The Reliability Coordinator does not necessarily own assets, but has a reliability authority over certain Facilities. The Planning Coordinator or Transmission Planner do not own assets but have planning authority over a set of Facilities. The Transmission Operator does not necessarily own assets but has operational authority over those Facilities. The Transmission Owner does own its Facilities and has authority over those Facilities.</p> <p>The FRSDT believes that the revised language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement.</p>	
Hoosier Energy Rural Electric Cooperative, Inc. - Robert Solomon	The Standard Drafting Team has provided an improved compromise by requiring identification of the second most limiting component. It is not clear how this draft will results in a more reliable system. Demonstrating that facility ratings do not exceed the rating of the most limiting component per Requirement 1.2 is sufficient from a reliability perspective. Some entities might be interested in the second most limiting component in order to know how much the rating can be increased.

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	But this is more of an economic evaluation when developing a specific project rather than a reliability issue.
	<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The FRSDT has made clarifying revisions to the proposed standard. Please see proposed revisions in the Summary Consideration under Question 1. The background information contained in the last posting provides the following reliability need for the proposed requirement:</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the “Emergency Rating” or “shorter term rating” as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour rating or some other value.</p>
Imperial Irrigation District	IID has submitted a NO vote with comments during the ballot period. Provided is IID justification for the NO vote:We agree the R8 requirement addresses the Commission’s directive, however we are seeking only clarification of the standard’s language that, if addressed will enable the vote to be changed to Affirmative. In order to minimize ambiguity we ask the Drafting Team to consider making the request apply ONLY to a Facility whose Thermal Rating has system impacts as identified through the following comment: 8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility whose Thermal Rating causes the Facility to be the Limiting Element and that the requester has identified as having an impact on their system affecting an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket: 8.2.1. Identity of the existing next most limiting equipment of the Facility 8.2.2. The Equipment’s Thermal Rating for the next most limiting Component identified in Requirement R8, Part 8.2.1.
	<p>Response: The FRSDT thanks you for your comment. The FRSDT has made clarifying revisions to the proposed standard that meet the intent of your comment. Please see proposed revisions shown in the Summary Consideration section for Question 1 above.</p>

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<p>IRC Standards Review Committee</p>	<p>FAC-008-2, R8 is redundant with respect IRO-010 R1 that requires the RC to ask for needed data; and R3 requires TOs and GOs to provide that facility data. It is not clear the purpose of R8.2.1, it appears to be ambiguous and lacks transparency. There is no identification of who defines a “major city” much less what constitutes a “major city”. Similarly there is no identification of who defines a “load pocket” much less what constitutes a “load pocket”. FAC-008 R8 could further reduces reliability because if the requirement were effected it would allow 30 days response time to reporting such data.</p> <p>NERC Standards MOD-012 & 013 also provides that such data is exchanged and coordinated among all entities. Unlike the IRO standards that require identification of data and the time frame to submit the data, the FAC-008 requires the request to be completed within 30 days. Waiting 30 days for data that is needed in the next day’s operation adversely impacts real time operations. Requirement R8 and its sub-parts to supply the second most limiting element for a piece of equipment serve no purpose. IRO-008 requires the RC to assess its area both day head, as well as every 30 minutes during the day. IRO-009 requires the RC to enact “preventive measures” if an IROL is predicted. The approval of and adherence to these two standards will ensure that the second most limiting component is never an issue. These two IRO standards that “the” most limiting element be respected not just for actual overloads but for predicted overloads. At no time is it allowable for an entity to exceed an established normal rating, only to observe the next most limiting element. The Models used by the RCs will define the level of detail of the data that needs to be provided. If the component data is needed then the RC will request the data be provided per IRO-010, and will be analyzed per IRO-008. If the data is not modeled than having the TO and GO submit that information is not an effective use of time or manpower. The Industry has posted a conforming set of requirements for TOPs, making this request premature or redundant.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The FRSDT does not believe that the proposed FAC-008-3 is redundant with any other standard. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The FRSDT has made clarifying revisions to the proposed standard. Please see proposed revisions in the Summary Consideration under Question 1. The background information contained in the last posting provides the following reliability need for the proposed requirement:</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some</p>	

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	<p>owners may elect to define the "Emergency Rating" or "shorter term rating" as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour rating or some other value.</p> <p>Regarding who identifies what systems qualify, the requester must establish that relationship in their request. Responding within 30 days is reasonable since it is recognized that these data cannot be responded to in real-time without pre-analysis.</p>
Luminant Power	<p>Luminant agrees that the Facility Rating standard should be revised and thanks the Standard Drafting Team (SDT) for their work and the opportunity to comment. The standard appears to be written to be more applicable to transmission owners and associated equipment and not to that of Generation Owners (GO). Luminant is concerned that the draft standard is not always clear as to what ratings are expected from GOs, and offers the following comments for consideration by the SDT.</p> <p>Requirement R1 is not clear what Ratings documentation has to be developed by the GO. The standard should only apply to the generating unit output capability, and then the equipment from the generator leads to the Point of Interconnection (POI). The requirements should not apply to the individual components that make up the generating unit such as boiler components, feedwater systems, condensate systems, environmental controls, etc. Getting into the details and systems that compose a generation unit would not provide any substantial benefit to the rating of the unit.</p> <p>Requirement R2.4 seems to imply the scope from the generating leads out to the POI, but it needs to be specifically clarified in the standard. Requirement R1 should contain a provision where the rating of a generating unit can be based upon a regulatory or legal limit to unit output. R1.2 appears unnecessary as the prime R1 requirement implies an accurate overall rating. Requirement R2.2 is confusing as to how it applies in relation to R2.1, in particular if the GO uses OEM information to rate the equipment. The footnote on 2.2.4, Operating limitations should be removed. Other NERC standards require unit conditions such as temporary deratings or unit capability changes to be reported to the BA or TOP in a timely manner.</p> <p>Requirement R2 has a Time Horizon of Long Term Planning, and temporary derates do not appear to fit that criteria. Requirement 2.4.2 requests both the normal and emergency rating for equipment from the MPT to the POI. While that may be needed and modeled for some situations, it is not necessary for all facilities. For example, at a generating facility where the lines, breakers, busswork and other electrical components from the MPT to the POI were designed and constructed well in excess of the output capability of the generating unit (and there is no transmission thru flow), the connections may not all be modeled to that level of detail. Luminant suggests the following language revision for 2.4.2: "The scope of the Ratings addressed shall include as a minimum both Normal and Emergency Ratings, where applicable and when requested by the Planning Authority or Planning Coordinator".</p> <p>Requirement R7 needs a boundary on the timeframe for a response. The way the current requirement is written, a requesting entity to send a notice to a TO or GO that they are scheduled to provide information one day later.</p> <p>The SDT's scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The background material provided with the posting of the standard. During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model)</p>

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	<p>to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the "Emergency Rating" or "shorter term rating" as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour rating or some other value. Your suggestions for improvements to Requirements R1 and R2 will be considered with the next revision to the standard.</p> <p>Luminant suggests the language be modified as follows: "...as scheduled by such requesting entities, but not sooner than 30 calendar days from the date of a specific request".</p> <p>The FRSDT made as few revisions to the standard as necessary to facilitate the timeline that the team is working under. The previously approved version of the standard uses the language "as scheduled by such requesting entities."</p> <p>Requirement R8 seems to imply that the applicable GO equipment is that in R2, it is not explicit. In a generating plant, there is a wide variety of equipment that may have a thermal rating. It appears the intent was to address Thermal Ratings for transmission type equipment only. Please clarify that for the GO, R8 only applies to GO equipment from the MPT to the POI.</p> <p>Requirement R8 only applies to GOs to which R2 is applicable. The verbiage in R2 only applies to "equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner".</p> <p>Requirement 8.1 (similar to R7) needs a boundary on the timeframe for a response. Luminant suggests the language be modified as follows: "As scheduled by the requesting entities, but not sooner than 30 calendar days from the date of a specific request".</p> <p>The FRSDT made as few revisions to the standard as necessary to facilitate the timeline that the team is working under. The previously approved version of the standard uses the language "as scheduled by such requesting entities."</p> <p>Requirements 8.2.1 and 8.2.2 could be combined as follows: "The identity and Equipment Rating of the next most limiting</p>

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	<p>equipment of the Facility”.</p> <p>The FRSDT wanted to avoid using compound requirements, so each piece of information is listed separately. Your suggestion is an acceptable substitute, but the overall majority of commenters agree with the proposed verbiage.</p> <p>The Requirement R8 proposed changes have an applicability to Generator Owners, however the SAR Applicability Section only has the Transmission Owner box checked.</p> <p>The text box in the standard explains the point that you make with respect to GO applicability:</p> <p style="padding-left: 40px;">R7 and M7 have been subdivided into two requirements (R7 and R8) and two Measures (M7 and M8). To distinguish the ‘new’ language proposed for R8 and M8 from the language that was previously approved under R7 and M7, only the new text is shown in redline</p>
<p>Response: The FRSDT thanks you for your comment. Please see responses above.</p>	
Manitoba Hydro	<p>Given the wide range in assumptions in short time overload, NERC should provide guidance for model building and assessments. NERC should outline the ratings to include (eg. should each entity have 15 minute, 30 minute, 1 hour, 4 hour, 8 hour, etc. ratings?) and should suggest how these ratings are documented, communicated and used.</p> <p>The FRSDT designed the requirements of FAC-008-3 to be sufficient for an entity to meet the reliability need of the directive without being prescriptive. The items that you suggest to include, while probably useful and clarifying would result in an extensive industry debate which may not lead to consensus.</p> <p>Also, the industry has previously rejected the requirement to identify the next most limiting facility based on the fact that it was not a reliability need, but commercially driven want.</p> <p>This is the first time that this requirement has been posted for comment and ballot.</p> <p>In its explanation as to why the next most limiting element is required FERC and the SDT have failed to show a reliability need. In Diagram 1 of the Unofficial Comment Form, it is obvious that if a transmission owner provides a continuous and a shorter term rating, the continuous rating of the facility is based on Equipment 3 and the shorter term rating is based on Equipment 2. There is no need to provide two continuous and two shorter term ratings from a reliability perspective.</p> <p>Not all entities provide graphics similar to Diagram 1 with their Facility Ratings. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The FRSDT has made clarifying revisions to the proposed standard. Please see proposed revisions in the Summary Consideration under Question 1. The background information contained in the last posting provides the following</p>

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	<p>reliability need for the proposed requirement:</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the "Emergency Rating" or "shorter term rating" as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour rating or some other value.</p>
<p>Response: The FRSDT thanks you for your comment. Please see responses above.</p>	
<p>Manitoba Hydro- Joe D Petaski;Greg C. Parent;S N Fernando;Daniel Prowse</p>	<p>Manitoba Hydro is voting negative for the following reasons: -The industry has previously rejected the requirement to identify the next most limiting facility based on the fact that it was not a reliability need, but commercially driven want. In its explanation as to why the next most limiting element is required, FERC and the SDT have failed to show a reliability need.</p>
<p>Response: The FRSDT thanks you for your comment. The industry has not rejected this requirement as this is the first time it has been posted for comment and ballot.</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the "Emergency Rating" or</p>	

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<p>MISO Standards Collaborators</p>	<p>The MISO has some concern with the implementation of the FAC-008-3 standard because it does not benefit or enhance reliability.</p>
	<p>Response: The FRSDT thanks you for your comment. The SDT's scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The FRSDT has made clarifying revisions to the proposed standard. Please see proposed revisions in the Summary Consideration under Question 1. The background information contained in the last posting provides the following reliability need for the proposed requirement:</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in the functional Model) to be able to take the Rating information and prepare Operating Plans or Planning Assessments prior to Real-time which could allow for better situational awareness and improved reliability of the bulk electric system. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. Each Transmission Owner and Generator Owner is required to have a valid rating methodology (under the requirements of FAC-008-1), each having somewhat unique inherent assumptions. Transmission Owners and Generator Owners define ratings (Normal and Emergency) for some time period at a loading level for each Facility, and the most limiting piece of equipment determines the Rating of the Facility for that time period. Some owners may elect to define the "Emergency Rating" or "shorter term rating" as an 8-hour rating, others may elect to use a 4-hour rating, and some a 1-hour rating or some other value.</p>
<p>Muscatine Power & Water -Tim Reed;John S Bos</p>	<p>MP&W agrees with the comments submitted by MRO NSRS. This affirmative vote reflects our belief that the proposed Standard will enhance the reliability of the Bulk Electric System and is an overall improvement to the two standards that it would replace.</p>
	<p>Response: The FRSDT thanks you for your comment. Thank you for your positive comment of support.</p>
<p>National Grid</p>	<p>1) National Grid feels it is most appropriate that the requesting party as proposed needs to have a legitimate reliability reason for requesting the information and they would be limited to the particular functional entities noted in the requirement as drafted.</p> <p>Thank you for your comment.</p> <p>2) National Grid already provides responsible parties (including the appropriate Reliability Coordinator, Planning Coordinator, and Transmission Operators) with ratings of shorter terms than continuous, as well as ambient based ratings, which can and do get applied to handle certain type of scenarios presented in the webinar. National Grid believes that there</p>

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	<p>is no special request needed for these parties to obtain such ratings, nor is there a need to ignore any equipment in development of such ratings. Moreover, ignoring existing equipment raises question of what potential reliability impacts would come along with this approach.</p> <p>If no entity requests additional information, National Grid is under no obligation or requirement to provide it.</p> <p>3) The treatment of multiple instances of same sized equipment (like several 800A disconnect switches in a circuit), is left unclear. In the webinar, one NERC response said to lump them all together and go to next higher limit. Another said to indicate such was the case that several pieces of equipment impose same limit. It was apparent that the only recourse would be to include language in each entity's ratings methodology should address how this is handled. It is suggested that this issue be addressed in the standard otherwise it will likely need to be addressed in a CAN or Interpretation Request.</p> <p>The FRSDT concurs with your point about adding the verbiage to your Facility Ratings Methodology. Modifying the standard to include this provision in the rating methodology requirement will be considered the next time the standard is revised.</p> <p>4) Description of how this info would be used implied that ops planner might exceed the most limiting element rating and go to next most so long as it was not a closely following relay limit that could put circuit at risk of pulling out. It is not clear to us how a system could be operated in excess of equipment ratings for the appropriate duration. The fact that we establish Short Time Emergency (STE) and Long Time Emergency (LTE) ratings higher than normal ratings that get applied in emergency situations for shorter than normal continuous timeframes seemed to be ignored.</p> <p>The FRSDT did not intend for any entity to exceed the most limiting element of a Facility. The situation described in Diagram 1 may not be applicable to all Facilities. This information is only required to be provided upon request.</p>
<p>Response: The FRSDT thanks you for your comment. Please see responses above.</p>	
<p>NERC Standards Review Subcommittee</p>	<p>The FERC directive may be too prescriptive in requiring a second limiting element and its facility rating. What might be useful in real-time operations would be a short-term rating of a facility (i.e. one hour rating) that may be already supplied in R2, which requires normal and emergency ratings.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT's scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. The directive was not intended to provide the System Operator with information to change Ratings in Real-time, but rather to have Operating Plans, Processes or Procedures in place for implementation for the limited subset of Facilities, when requested, whose thermal ratings cause (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major load centers. The FRSDT has made clarifying revisions to the proposed standard. Please see proposed revisions in the Summary Consideration under Question 1. The background information contained in the last posting provides the following reliability need for the proposed requirement:</p> <p>During the discussions on February 24, FERC staff clarified that the intent of the Order 693 directive was for reliability entities (as defined in</p>	

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<p>Niagara Mohawk (National Grid Company)</p>	<p>1) We feel it is most appropriate that the requesting party as proposed needs to have a legitimate reliability reason for requesting the information and they would be limited to the particular functional entities noted in the requirement as drafted. Thank you for your comment.</p> <p>2) National Grid already provides responsible parties (including the appropriate Reliability Coordinator, Planning Coordinator, and Transmission Operators) with ratings of shorter terms than continuous, as well as ambient based ratings, which can and do get applied to handle certain type of scenarios presented in the webinar. National Grid believes that there is no special request needed for these parties to obtain such ratings, nor is there a need to ignore any equipment in development of such ratings. Moreover, ignoring existing equipment raises question of what potential reliability impacts would come along with this approach.</p> <p>If no entity requests additional information, National Grid is under no obligation or requirement to provide it.</p> <p>3) The treatment of multiple instances of same sized equipment (like several 800A disconnect switches in a circuit), is left unclear. In the webinar, one NERC response said to lump them all together and go to next higher limit. Another said to indicate such was the case that several pieces of equipment impose same limit. It was apparent that the only recourse would be to include language in each entity's ratings methodology should address how this is handled. It is suggested that this issue be addressed in the standard otherwise it will likely need to be addressed in a CAN or Interpretation Request.</p> <p>The FRSDT concurs with your point about adding the verbiage to your Facility Ratings Methodology. Modifying the standard to include this provision in the rating methodology requirement will be considered the next time the standard is revised.</p> <p>4) Description of how this info would be used implied that ops planner might exceed the most limiting element rating and go to next most so long as it was not a closely following relay limit that could put circuit at risk of pulling out. It is not clear to us how a system could be operated in excess of equipment ratings for the appropriate duration. The fact that we establish</p>

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<p>Response: The FRSDT thanks you for your comment. Please see responses above.</p>	
<p>Pacific Northwest Small Public Power Utility Comment Group</p>	<p>Please see http://www.nerc.com/filez/enforcement/FinalFiled_ANOP_NOC-505.pdf for an example of how FAC-009-1 R1 and R2 (to be replaced by FAC-008-3 R6 and R7) for an example of how these regulations are being applied improperly to radially operated local distribution systems. Suggest “4.1. Transmission Owner (radially operated facilities excluded).”</p>
<p>Response: The FRSDT thanks you for your comment. We will forward your comment, which is asking for a revision to the standard that is outside the scope of this project, for inclusion in the NERC Issues Database for future consideration.</p>	
<p>PacifiCorp</p>	<p>Under FAC-008-3 Requirement R8, each Transmission Owner and Generator Owner (subject to Requirement R2) shall provide certain information, including facility ratings information, to the listed registered entities. The information to be provided includes, according to the proposed Requirement R8, information related to “solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities).” The requirement for all Transmission Owners and Generator Owners to submit data for jointly owned facilities will mostly likely result in the following: 1) duplicative information being submitted by joint-owners of the same Facilities; and 2) while only one joint owner is likely to have responsibility for developing facility ratings, other joint owners may become liable under this requirement for activities over which they do not have clear authority to perform. Requirement R8, as written, is relatively clear and unambiguous and PacifiCorp agrees with what appears to be the intent of the requirement (i.e. that there are no gaps in facilities ratings that occur due to joint-ownership arrangements). However, due to ambiguity as to which entity or entities to which the requirement may be applicable, the standard may not be enforced effectively or equitably. PacifiCorp suggests that, to resolve this issue, the standard should require that an entity that jointly-owns Facilities designate a single registered entity as responsible for the provision of the required information.</p>
<p>Response: The FRSDT thanks you for your comment. Since this information must be requested, it would be unlikely that duplicate information would be provided. Nothing in the standard prevents joint owning entities from designating a responsible party.</p>	
<p>SERC Reliability Corporation – Carter B. Edge</p>	<p>I am voting affirmative with the understanding that this standards revision proposes to address the Order 693 directive with an equally effective alternative that addresses the reliability concern of the original directive.</p>

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<p>Response: The FRSDT thanks you for your comment. Thank you for your supportive comment.</p>	
<p>Southern Company Generation (SCG) Technical Services Southern Company Transmission</p>	<p>The following comment uses the Comment form example definitions and Diagram 1 from the Reliability Objective Discussion section: We believe that the intent of the Directive’s requirement, as clarified in the September 16, 2010 Order, is to identify situations where an increased short term or emergency rating of Equipment 3 could result in Equipment 2 becoming the limiting component in the short term. In that case the identity of both equipments and their ratings, the Equipment 3 continuous rating and the Equipment 2 shorter term rating, would seem to meet the Directive’s clarified requirement. In cases where the limiting equipment’s continuous rating is equal to its emergency rating (Equipment 3 blue curve is a straight line) there would not be a need to specify a second component. The “Reliability Objective Discussion” and R 8.2.2 goes much further by suggesting that four data points (two for Equipment 3 and two for Equipment 2) are required being the continuous and emergency ratings for limiting and next most limiting equipment.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. This order clearly requires the identification of the second most limiting equipment. Requirement R8, Part 8.2.2 has been revised by replacing “Equipment” with “thermal” ratings. If you have multiple sets of ratings, then it is expected that the information requested under Requirement R8, Part 8.2.2 will be for each rating that is requested.</p>	
<p>SRP</p>	<p>A significant amount of staff time would be required to comply with the proposed “next most limiting element” requirement. It’s not clear that the information would be of value to FERC or NERC. In many cases the administrative burden on the utilities would only provide trivial or self-evident results.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. Since rating must consider determine the “most limiting element, the second most limiting element is generally known.</p>	
<p>Sunflower Electric Power Corporation- Noman Lee Williams</p>	<p>Even though the SDT has developed what some may consider a reasonable compromise by requiring identification of the second most limiting component, it is not clear how this results in a more reliable system. In addition, from a reliability perspective, demonstrating that facility ratings do not exceed the rating of the most limiting component per Requirement 1.2 is sufficient. Some entities might be interested in the second most limiting component in order to know how much the rating can be increased. But this is more of an economic evaluation when developing a specific project rather than a reliability issue.</p>
<p>Response: The FRSDT thanks you for your comment. The SDT’s scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments. Yes, SDT does believe this is the most reasonable way to address the issue.</p>	

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<p>Tennessee Valley Authority - Larry Akens; Ian S Grant; David Thompson; Marjorie S. Parsons</p>	<p>TO Comments:</p> <ul style="list-style-type: none"> o For 3.1 add “conservative engineering judgment” as an option. If a CT is assumed to be rated for 1.0 rating factor because there is no certainty of whether it has a rating factor of 2.0, does this fall under engineering “analysis?” The rating factor is not provided by the manufacturer for older equipment and can’t be obtained if they are out of business now. For some equipment certain manufacturers may have been tested and ratings verified, but that may not apply to other manufacturers. <p>GO Comments</p> <ul style="list-style-type: none"> o The standard is not written clearly to determine the requirements for the GO in R1 and R2. In our company, the GO owns the GSU, with the transition to the TO occurring at the high side terminals of the GSU. My assumption for complying with this standard as a GO is that R1 includes the generator and the GSU, and R2 is not applicable to my company because no equipment falls into that category. o R1 - As written, R1 clearly includes the GSU for our situation, but 1.1 only lists the generator requirements, the GSU is not listed in 1.1. Suggested addition underlined: “1.1 The documentation shall contain assumptions used to rate the generator and the GSU if owned by the GO, and at least one of the following.....” o R2 - The requirement states “Each GO shall have a documented methodology for determining Facility Ratings of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the TO.....” The problem is that there are 2 locations specified in R1, the low side terminals of the GSU and the high side terminals of the GSU. It’s not clear which location is being referred to in R2. In our company, where the high side of the GSU is the point of ownership transition, there is no equipment between the “location specified in R1” and the point of interconnection with the TO, it is the same point.
<p>Response: The FRSDT thanks you for your comment. The comments pertaining to the GO applicability and Requirements R1, R2 and R3 are outside the scope of the supplemental SAR. We will forward your comments for inclusion in the NERC Issues Database for future consideration.</p>	
<p>The Valley Group, a Nexans company</p>	<p>In December 2010, NERC Smart Grid Task Force published Report “Reliability Considerations from the Integration of Smart Grid”, and in it, there is an excerpt on “Integration of Smart Grid Technology into the Bulk Power System”, Section 3, page 12. In this excerpt, it is stated that Smart Grid provides the ability to create an overarching, coordinated and hierarchical approach to automation, control and effectiveness. Among examples of smart grid technologies, Dynamic Thermal Circuit Rating (DTCR) devices were numbered. Although the objective of NERC Project 2009-06 is to identify the limiting component(s) and next limiting component(s) for all critical facilities, and not about Smart Grid integration; however, it should be beneficial to state a need for smart grid technologies integration, especially DTCR devices, into this NERC project. While the paramount importance is to maintain the reliability and integrity of the bulk power system, it is of equal importance to introduce reliability and economic benefits that Smart Grid technologies are bringing. So careful planning, coordination, and possibly review of the current Facility Rating Methodologies should be encouraged and introduced at present time. Static transmission line ratings, and static ratings of power system equipment in general, belong to past</p>

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	practices, and entities should be encouraged to embrace Smart Grid into their systems.
<p>Response: The FRSDT thanks you for your comment. Thank you for your forward looking comment. This may be considered in future revisions. The SDT's scope was to address the remaining issues of FERC Order 693.</p>	
United Illuminating Company	<p>R8.2 "... for any requested Facility with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket:" "Major City" is an undefined term. It is akin to terms like Bulk Power System, and Integrated. Everyone has an opinion on what it means. What are the properties utilized to identify a municipality as a "Major City". These properties/attributes should be in an attachment. Does 8.2 refer to any load pocket or only Major Load Pockets. How is a Major Load Pocket determined? These properties/attributes should be in an attachment.</p>
<p>Response: The FRSDT thanks you for your comment. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. The FRSDT intended for impacted entities to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. The FRSDT chose this specific language because the entities listed do not necessarily own Facilities. The Reliability Coordinator does not necessarily own assets, but has a reliability authority over certain Facilities. The Planning Coordinator or Transmission Planner do not own assets but have planning authority over a set of Facilities. The Transmission Operator does not necessarily own assets but has operational authority over those Facilities. The Transmission Owner does own its Facilities and has authority over those Facilities.</p> <p>The FRSDT believes that the revised language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement.</p>	
We Energies	<p>We maintain that the changes based on the FERC directive should not be applied to Generator Owners. The connection from the generator to the transmission system is a radial connection which by its nature does not significantly impact the power transfer capability across the Bulk Electric System. The effort and cost for Generator Owners to be subject to these additional requirements is not accompanied by an increase in reliability, and is therefore not justified.</p>
<p>Response: The FRSDT thanks you for your comment. Requirement R8 only applies to GOs to which R2 is applicable. The verbiage in R2 only</p>	

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Xcel Energy	<p>applies to "equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner".</p> <p>As explained in the response to question 1 above, if the purpose of Requirement 8 is to aid in the operation of the BES, it does not accomplish this, since the most limiting element must be respected. Knowledge of a higher rating (from the next most limiting element) could give an operator a false sense that the system could be operated at a higher limit. If the purpose of Requirement 8 is to aid in planning, there is a lot of additional information that would be required. In order to determine a new facility rating assuming the current most limiting factor is not present, then a study period longer than the proposed 30 days may be required. There are many factors that would need to be considered in making this determination. With that said, Xcel Energy feels that this type of planning analysis is already occurring and minimal increase in reliability would be gained by such a requirement. Transmission Planners are already tasked with developing plans to serve projected loads at various generation/load patterns. To properly do this, information must already be evaluated with area utilities on increasing ratings when needed. If the real goal is to determine what would need to be done to bring a facility up to a higher rating, the requesting entity should identify a target loading level (MVA) for the analysis in their request to the entity that owns the equipment. This study would be based on a requested loading level (MVA), as one could not derive this from the next limiting element. The proposed requirement also presupposes that all limitations are thermal in nature. For some northern entities, while the most limiting factor may be equipment, the next most limiting factor in the ability to move power may be a presidential permit. Likewise, for a generating facility, the next most limiting factor may be a piece of equipment in the balance of the plant (boiler, turbine, etc.). The requirement does not seem to recognize this.</p> <p>Finally, Xcel Energy believes the requirement should more clearly define who can request the "next most limiting element". While the requirement clearly states who the information must be provided to, it does not seem to limit who can request that information. Limiting who can request this information would help keep this requirement more focused on reliability, and may prevent market participants from making requests that are not focused on reliability. Xcel Energy proposes the following modification to R8.1 and R8.2:8.1. As scheduled by the requesting entities (associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s))8.1.1. Facility Ratings 8.1.2. Identity of the most limiting equipment of the Facilities 8.2. Within 30 calendar days (or a later date if specified by a requesting entity), for any requested Facility with a Thermal Rating that the requester has identified as having an Interconnection Reliability Operating Limit, limiting Total Transfer Capability, impeding generator deliverability, or impeding service to a major city or load pocket: 8.2.1. Identity of the existing next most limiting equipment of the Facility 8.2.2. The Equipment Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.</p>
	<p>Response: The FRSDT thanks you for your comment. The SDT's scope was to address the remaining issues of FERC Order 693, which requires the inclusion of the topics of your comments.</p> <p>The proposed standard does limit the scope of who can request the information. Clarifying revisions were made to eh standard to address your concerns. Please see the proposed revision under the Summary Consideration for Question 1. The FRSDT has revised the requirement to provide more clarity around the entities that may request the information contained in the requirement. The FRSDT intended for impacted entities to be able to request this information to better plan and operate their systems. The language has been modified to better reflect this intent as well as to</p>

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	<p>more closely mirror the language of the FERC directive. The team added language to provide more clarity on the scope of entities that may request the specified additional information only for impacted facilities under their authority. The FRSDT also revised the term "a major city or load pocket" to "a major load center". Power engineers and operators will be qualified to make the judgment of what a major load center is (allowing relative judgment) rather than having to specify the demographics of what a major city is or define a load pocket. With the proposed clarification, the FRSDT does not believe that the requirement is subject to erroneous interpretation by entities since the requesting entity makes the determination as to whether their Facilities are impacted. This will provide better guidance with respect to "major load centers" as the impacted entity will make the determination through studies and request the ratings information for facilities under its authority. The FRSDT chose this specific language because the entities listed do not necessarily own Facilities. The Reliability Coordinator does not necessarily own assets, but has a reliability authority over certain Facilities. The Planning Coordinator or Transmission Planner do not own assets but have planning authority over a set of Facilities. The Transmission Operator does not necessarily own assets but has operational authority over those Facilities. The Transmission Owner does own its Facilities and has authority over those Facilities.</p> <p>The FRSDT believes that the revised language provides sufficient guidance for applicable entities and provides enough latitude to address varying scenarios which apply under this requirement.</p>