

Consideration of Comments

Project Name:	2015-09 Establish and Communicate System Operating Limits FAC-014-3
Comment Period Start Date:	2/19/2021
Comment Period End Date:	4/5/2021
Associated Ballots:	2015-09 Establish and Communicate System Operating Limits FAC-014-3 AB 5 ST

There were 43 sets of responses, including comments from approximately 122 different people from approximately 93 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

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 of Engineering and Standards, [Howard Gugel](#) (via email) or at (404) 446-9693.

1. The SDT made revisions to FAC-014-3 in response to comments, namely with the inclusion of time horizons on the subparts of R5 and an annual reporting requirement in R5.6. Do you agree with the revisions? If not, please explain why.

2. The SDT received numerous comments regarding whether CIP-002.5.1a should be revised based upon the drafting team's revisions to FAC-011 and FAC-014. The SDT is not revising CIP-002.5.1a and provided a rationale document describing its reasoning with this posting. Do you agree with not revising CIP-002.5.1a and the reasoning provided? If not, please explain why?

3. If you have any other comments regarding FAC-014-3 that you haven't already provided, please provide them here.

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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
New York Independent System Operator	Gregory Campoli	2		ISO/RTO Standards Review Committee	Gregory Campoli	New York Independent System Operator	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Del Viscio	PJM	2	RF
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	RF
					Ali Miremadi	CAISO	2	WECC
					Kahtleen Goodman	ISO-NE	2	NPCC
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					Marc Donaldson	Tacoma Public Utilities (Tacoma, WA)	3	WECC

					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NA - Not Applicable,RF,SERC,Texas RE,WECC	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					David Hartman	Arizona Electric Power Cooperative	1	WECC
					Susan Sosbe	Wabash Valley Power Association	3	RF

DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
MRO	Kendra Buesgens	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Christopher Bills	City of Independence Power & Light	4	MRO
					Fred Meyer	Algonquin Power Co.	1	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Jodi Jensen	Western Area Power Administration - Upper Great Plains East (WAPA)	1,6	MRO
					John Chang	Manitoba Hydro	1,3,6	MRO

Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
Marc Gomez	Southwestern Power Administration	1	MRO
Matthew Harward	Southwest Power Pool, Inc.	2	MRO
LaTroy Brumfield	American Transmission Company, LLC	1	MRO
Bryan Sherrow	Kansas City Board Of Public Utilities	1	MRO
Terry Harbour	MidAmerican Energy	1,3	MRO
Jamison Cawley	Nebraska Public Power	1,3,5	MRO
Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
Michael Brytowski	Great River Energy	1,3,5,6	MRO
Jeremy Voll	Basin Electric Power Cooperative	1,3,5	MRO

					Joe DePoorter	Madison Gas and Electric	4	MRO
					David Heins	Omaha Public Power District	1,3,5,6	MRO
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC,Texas RE	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Ann Carey	FirstEnergy - FirstEnergy Solutions	6	RF
					Mark Garza	FirstEnergy-FirstEnergy	4	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC

					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Jim Howell	Southern Company - Southern Company Services, Inc. - Gen	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State	7	NPCC

	Reliability Council		
David Burke	Orange & Rockland Utilities	3	NPCC
Helen Lainis	IESO	2	NPCC
David Kiguel	Independent	7	NPCC
Nick Kowalczyk	Orange and Rockland	1	NPCC
Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC

Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Cristhian Godoy	Con Ed - Consolidated Edison Co. of New York	6	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Nurul Abser	NB Power Corporation	1	NPCC
Randy MacDonald	NB Power Corporation	2	NPCC
Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC
Vijay Puran	NYSPS	6	NPCC
ALAN ADAMSON	New York State	10	NPCC

1. The SDT made revisions to FAC-014-3 in response to comments, namely with the inclusion of time horizons on the subparts of R5 and an annual reporting requirement in R5.6. Do you agree with the revisions? If not, please explain why.

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer No

Document Name

Comment

In reviewing the language for requirement R5.4, the focus is on the Operational Planning Analysis, which NERC defines as a next day analysis. Given the NERC time horizon definitions (https://www.nerc.com/pa/Stand/Resources/Documents/Time_Horizons.pdf), the only applicable time horizon appears to be Operations Planning since Same-day Operations applies to “the timeframe of a day” and Real-time Operations applies to “one hour or less”. In the alternative, if the drafting team believes these time horizons do apply, we recommend that the team update the rationale requirements document to explain how these other time horizons apply to the OPA.

Likes 0

Dislikes 0

Response

Thank you for your comment. Requirement 5.3 in FAC-014-3 provides the value for the stability limits established by the RC per requirements 1 and 4 for use in Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. For established IROLs, the SDT thought requirement 5.4 only made sense in the Operational Planning Analysis “space” to provide all of the information indicated per Requirement Parts 5.2.2 – 5.2.6. These standards merely set the “floor” for what is required, and an RC and its TOPs can agree on additional information to be shared Same-day Operations and Real-time Operations.

Scott Miller - Scott Miller On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Scott Miller

Answer No

Document Name

Comment

Regarding the annual reporting requirement, Southern thinks it would be more appropriate to provide the information initially and then provide information as it changes, such as “within 90 days of a change.” Southern suggests that would be true for all of R5, not just R5.6.

Likes 0

Dislikes 0

Response

Thank you for your response. The SDT considered a number of potential reporting schemes, and after listening to feedback from the SDT members and industry, settled on the “at least once every 12 months” timeframe. This time-reference does not preclude an RC from providing the information more frequently if so desired, but merely establishes a common frame for the industry, and allows entities sufficient time to evaluate changes to the information, as well as those entities receiving the information time to prepare receipt and action based upon the information.

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer

No

Document Name

Comment

The standard is not results-based.

Unfortunately, this project is six years old and needs to end.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	No
Document Name	
Comment	
<p>Southern Company believes it is more appropriate to provide information initially and then provide information within a certain prescribed timeframe as the information changes. Several changes could occur within the annual period and users would not have the most up to date information. Additionally, the annual update is unnecessary if the information does not change.</p> <p>The addition of the “Time Horizon” in R5.1-R5.6 does not provide useful clarification as R5 already indicates the applicable time horizons. Not only does this introduce un-necessary confusion for the RC in addressing the requirements, it appears to limit the flexibility in providing the SOL/IROL information the RC deems appropriate. For instance, it appears the RC is limited in R5.1 and R5.2 to only provide SOLs/IROLs identified in the Operations Planning time fame. Southern recommends removing the addition of the “Time Horizons” in R5.1-R5.6.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your response. The SDT considered a number of potential reporting schemes, and after listening to feedback from the SDT members and industry, settled on the “at least once every 12 months” timeframe. This time-reference does not preclude an RC from providing the information more frequently if so desired, but merely establishes a common frame for the industry, and allows entities sufficient time to evaluate changes to the information, as well as those entities receiving the information time to prepare receipt and action based upon the information.</p> <p>Many commenters requested clarification on the applicable Time Horizon for the requirements in FAC-014-3, and seemed to appreciate the applied entries. As noted above, these merely establish a minimum common basis for industry, and can be exceeded with agreement between the RC and those interested parties.</p>	
Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5	

Answer	No
Document Name	
Comment	
See comments from Southern Company.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see our responses to Southern Company.	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
none	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb	
Answer	Yes
Document Name	

Comment	
Energry incorporates by reference and supports Edison Electric Institute's response to Question 1.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see our response to Edison Electric Institute.	
Jamie Johnson - California ISO - 2	
Answer	Yes
Document Name	
Comment	
CAISO agrees with comments submitted by the ISO/RTO Council (IRC) Standards Review Committee.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see our response to the ISO/RTO Council (IRC) Standards Review Committee.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
N/A.	

Likes	0
Dislikes	0
Response	
Wayne Guttormson - SaskPower - 1	
Answer	Yes
Document Name	
Comment	
Support the MRO NSRF comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Please see our response to the MRO NSRF comments.	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes	0
Dislikes	0
Response	

Thank you for your comment. Please see our response to Edison Electric Institute.

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer Yes

Document Name

Comment

Alliant Energy supports the comments submitted by the MRO NSRF.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see our response to the MRO NSRF comments.

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable

Answer Yes

Document Name

Comment

EI supports the inclusion of “at least once every 12 months” to Requirement R5, Part 5.6, as well as the addition of Time Horizons to the various parts of Requirement R5.

Likes 0

Dislikes 0

Response

Thank you for your response.

Daniel Gacek - Exelon - 1

Answer	Yes
Document Name	
Comment	
On behalf of Exelon (Segments 1, 3, 5, 6)	
Exelon concurs with the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see our response to EEI's comments.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	Yes
Document Name	
Comment	
We support the revisions made by the SDT to FAC-014-3.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	

Answer	Yes
Document Name	
Comment	
The IRC SRC appreciates the clarification made by the SDT to the language and applicable Time Horizons in Part 5.6 to specify “at least once every twelve calendar months.” This timeframe should allow sufficient analysis to document IROLs that will persist and need monitoring by the Reliability Coordinator and any necessary action by asset owners, per CIP standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bruce Reimer - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
James Baldwin - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Gladys DeLaO - CPS Energy - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
sean erickson - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Robert Stevens - CPS Energy - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Truong Le - Truong Le On Behalf of: Aaron Casto, Florida Municipal Power Pool, 6; Dale Ray, Florida Municipal Power Agency, 6, 4, 5, 3; - Truong Le	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Aidan Gallegos - PNM Resources - Public Service Company of New Mexico - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

2. The SDT received numerous comments regarding whether CIP-002.5.1a should be revised based upon the drafting team’s revisions to FAC-011 and FAC-014. The SDT is not revising CIP-002.5.1a and provided a rationale document describing its reasoning with this posting. Do you agree with not revising CIP-002.5.1a and the reasoning provided? If not, please explain why?

Truong Le - Truong Le On Behalf of: Aaron Casto, Florida Municipal Power Pool, 6; Dale Ray, Florida Municipal Power Agency, 6, 4, 5, 3; - Truong Le

Answer	No
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Document Name	
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Comment

Support Texas RE's comments.

Likes 0	
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Dislikes 0	
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Response

Please see response to Texas RE.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	No
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Document Name	
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Comment

Texas RE does not agree with not revising CIP-002-5.1. First, Texas RE notes that while PCs and TPs were removed from identifying IROLs in FAC-014, CIP-002 and CIP-014 still reference the PCs and TPs identifying Interconnection Reliability Operating Limits (IROLs). Second, since the RC does not have a timeframe for identifying SOLs, there could be a gap in that CIP protections may not occur for up to 24 months in accordance with the CIP-002-5.1 Implementation Plan.

Section 2.6 of the Impact Criteria of CIP-002-5.1, states that the PC and TP identify generation that is critical to the derivation of IROLs. Section 4.1.1.3 of the Applicability section of CIP-014-2 does this as well. However, FAC-014-3 removed the requirements for the PC and TP to establish IROLs. While the SDT indicates that PCs and TPs may continue to conduct planning assessments and provide Corrective Action Plans (CAPs) to address identified system deficiencies to their RCs, there ultimately is no definitive obligation within the NERC Reliability Standards for PCs and TPs to explicitly identify generation critical to the derivation of IROLs. From Texas RE's perspective, this results in reliability gaps because the TPL-001 planning assessment process does not explicitly incorporate the specific IROL derivation reliability task.

Texas RE believes that this gap has important consequences for the timing of the identification of IROLs and the corresponding implementation of CIP controls. Given that the TPs and PCs were removed from establishing IROLs in FAC-014-3, no identity is explicitly responsible for identifying IROLs in the planning horizon. Texas RE recommends explicitly keeping the TPs and PCs involved with this process in CIP-002 and CIP-014. Having the PCs and TPs conduct this analysis in the planning horizon many months or years prior to the IROL being established allows time for the generation and Transmission Facilities to establish CIP protections on the IROL.

Since FAC-014-3 does not include a time-frame specified for the RC to establish IROLs and no studies are required by the RC until a day prior to Real-time operations (OPA), the RC may not identify these Facilities before that point. Since the implementation plan for CIP-002-5.1 allows for an implementation period of 12 or 24 months depending on the scenario, this could result in a Facility that is determined to be critical to the derivation of an IROL not having adequate cyber and physical security controls for a period of up to 24 months.

This could be resolved by revising the impact criteria in CIP-002 and the applicability in CIP-014. In section 2.6 of the impact criteria for CIP-002, Texas RE recommends removing the reference to PCs and TPs, as they are no longer involved with identifying IROLs per FAC-14-3. Texas RE further recommends adding an additional criterion with the following verbiage: *Facilities identified by the Planning Coordinator or Transmission Planner, per its Planning Assessment of the Near-Term Transmission Planning Horizon or its Transfer Capability Assessment*

(Planning Coordinator only) as a Facility that if lost or degraded are expected to result in instances of instability, Cascading, or uncontrolled separation. This verbiage is consistent with the applicability section of FAC-003-5.

In CIP-014, Texas RE recommends revising section 4.1.1.3 of the Applicability to: *Facilities identified by the Planning Coordinator or Transmission Planner, per its Planning Assessment of the Near-Term Transmission Planning Horizon or its Transfer Capability Assessment (Planning Coordinator only) as a Facility that if lost or degraded are expected to result in instances of instability, Cascading, or uncontrolled separation.*

These changes would explicitly allow for the PC and TPs to be involved with identifying Facilities that if lost or degraded are expected to result in instances of instability, Cascading, or uncontrolled separation. Doing this in the planning horizon will allow for the identified Facilities to establish CIP protections much earlier in the process, reducing the potential reliability issues posed by such critical Facilities.

Likes	0
Dislikes	0

Response

Thank you for your comments. The SDT notes that Section 2.6 of the Impact Criteria of CIP-002-5.1 identifies that “IF” a PC or TP were to identify such facilities, they would have to be taken into consideration. This criteria does not obligate a PC or TP to identify these items. Because a PC or TP do not identify “operating” limits, including IROLs, the RC is the correct functional entity to identify IROLs and the facilities critical to the derivation of the IROL and its associated contingencies. While the SDT agrees that a future modification to CIP-002-5.1 can remove such references, the SDT still contends that there is no reliability gap created as the RC still identifies all IROLs.

The SDT does not believe it is appropriate for the PC or TP to establish IROLs as IROLs are “operating” limits. The RC typically evaluates more operating conditions than the planning horizon studies and has additional outages to contend with. Additionally, the RC can better determine which contingencies to consider. While these studies are often conducted well in advance of next day operations (up to one year), this allows for the proper identification and establishment of these operating limits. It would not be practical to establish security controls until the RC who is the entity to establish the “operating” limit has evaluated and determined the facilities critical to the derivation of an IROL. The SDT

notes that there are several other criterion where the facilities are identified via other criteria or where it is appropriate for the PC/TP to identify facilities (2.3).

The SDT notes the concern, but believes this concern would be present with either version of FAC-014 (current or new) and is outside the scope of the SDT's SAR to address the implementation period of the security controls. The SDT contends that the facilities related to the IROLs are better clarified to be the responsibility of the RC and that there is no reliability gap created. If a CIP SDT would want to modify the implementation period or determine a different criterion is better suited than an IROL, the CIP SDT should address such changes.

The SDT contends that the facilities related to the IROLs are better clarified to be the responsibility of the RC and that there is no reliability gap created. If a CIP SDT would want to modify the implementation period or determine a different criterion is better suited than an IROL, the CIP SDT should address such changes.

Bruce Reimer - Manitoba Hydro - 1

Answer	No
Document Name	
Comment	
We agree that the CIP-002.5.1a criterion 2.6 can be retained without changes, but the Guidelines and Technical Basis as part of CIP-002-5.1a standard will need to be updated to reflect and align with FAC-014 R5 changes (see references cited for Criterion 2.6 at the bottom of page 25 and page 28 of CIP-002.5.1a). Without this linkage, Generator Owners or Transmission Owner receiving information pursuant to FAC-014-3 for the first time may fail to make the correlation to CIP-002-5.1a resulting in missing the identification of medium impact BES Facilities.	
Likes	0
Dislikes	0

Response

Thank you for your comment.

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer	Yes
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Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	Yes
Document Name	
Comment	

We support the SDT not revising CIP-002-5.1a.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	
On behalf of Exelon (Segments 1, 3, 5, 6)	
Exelon concurs with the comments submitted by the EEI.	
Likes	0
Dislikes	0
Response	
Please see response to EEI.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

EEl supports the arguments contained in the Technical Rationale document titled “Technical Rationale for Exclusion of CIP Criteria Modifications by Project 2015-09” which addresses why there are no reliability gaps resulting from the retirement of FAC-010.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4

Answer Yes

Document Name

Comment

Alliant Energy supports the comments submitted by the MRO NSRF.

Likes 0

Dislikes 0

Response

Please see response to MRO NSRF.

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports EEl comments.

Likes	0
Dislikes	0
Response	
Please see response to EEI.	
Wayne Guttormson - SaskPower - 1	
Answer	Yes
Document Name	
Comment	
Support the MRO NSRF comments.	
Likes	0
Dislikes	0
Response	
Please see response to MRO NSRF.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
N/A.	
Likes	0
Dislikes	0
Response	

Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	Yes
Document Name	
Comment	
<p>CIP-002.5.1.a was already revised, vetted by industry and by NERC, approved by all, then submitted to FERC. Recently NERC withdrew it.</p> <p>The CIP virtualization project is also modifying it. Very confusing. Please no more changes.</p>	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Jamie Johnson - California ISO - 2	
Answer	Yes
Document Name	
Comment	
CAISO agrees with comments submitted by the ISO/RTO Council (IRC) Standards Review Committee.	
Likes	0
Dislikes	0
Response	
Please see response to ISO/RTO Council (IRC) Standards Review Committee.	

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb

Answer Yes

Document Name

Comment

Evergy incorporates by reference and supports Edison Electric Institute's response to Question 2.

Likes 0

Dislikes 0

Response

Please see response to EEI.

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer Yes

Document Name

Comment

none

Likes 0

Dislikes 0

Response

Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5

Answer Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Aidan Gallegos - PNM Resources - Public Service Company of New Mexico - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Teresa Krabe - Lower Colorado River Authority - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Robert Stevens - CPS Energy - 1,3,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
sean erickson - Western Area Power Administration - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Gladys DeLaO - CPS Energy - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
James Baldwin - Lower Colorado River Authority - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	

Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Scott Miller - Scott Miller On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Scott Miller

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric

Answer Yes

Document Name

Comment

Likes	0
Dislikes	0
Response	
Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike, Group Name Tacoma Power	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

3. If you have any other comments regarding FAC-014-3 that you haven't already provided, please provide them here.

Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC

Answer

Document Name

Comment

Nothing to add

Likes 0

Dislikes 0

Response

Thank you for your comment.

Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Thomas Foltz - AEP - 5

Answer	
Document Name	
Comment	
<p>AEP has expressed its concerns in previous comment periods regarding the proposed revisions to FAC-014. A majority of those concerns and comments still stand and will not be restated again in their entirety in this current comment period. We would, however, like to offer the following thoughts and suggestions for consideration.</p> <p>AEP thanks the drafting team for clarification on the meaning of “stability criteria” within R6. However, we find no reason why stability criteria consisting of acceptable power swing damping level, transient voltage dip and recovery durations, the necessity for the system to remain stable, and contingency definitions used in studies to evaluate stability would be any different in operations versus planning time-frames. We believe that the practical effect of including stability criteria in R6 will be to produce unnecessary administrative paperwork.</p> <p>While we are somewhat encouraged that future consideration might be given to moving R6, R7 and R8 into TPL-001, we do remained concerned by the inference that this “move” might not happen until *after* these three requirements are first placed within FAC-014. We believe efforts to pursue such changes should be dealt with *only* as part of revising TPL-001, rather than *moving* them from FAC-014 to TPL-001 sometime in the future. As previously stated, rather than pursuing such changes within FAC-014, AEP recommends removing “stability criteria” from the proposed R6 and transferring the proposed R6, R7 and R8 over to a TPL-001 Standards Drafting Team. While well intentioned, we believe the Project 2015-09 Standards Drafting Team is unintentionally encroaching on the TPL domain by proposing such requirements be placed within FAC-014. These requirements are best served if drafted and reviewed from a Transmission Planner perspective, as these individuals would be in the best position to properly evaluate their necessity in view of the potential for nullification, or by possible reliance on operational actions and system adjustments not considered corrective action plans.</p> <p>In closing, while AEP has once again chosen to vote negative as driven by the concerns stated above, we appreciate the efforts of the standards drafting team, and we envision potentially supporting such an effort provided a) “stability criteria” is removed from the proposed R6 and b) by dealing with R6, R7, and R8 solely within a project to revise TPL-001.</p>	
Likes	0
Dislikes	0

Response

Thank you for your comments.

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb

Answer

Document Name

Comment

Evergy incorporates by reference and supports Edison Electric Institute's response to Question 3.

Likes 0

Dislikes 0

Response

Thank you for your comment. Please see our response to EEI.

Jamie Johnson - California ISO - 2

Answer

Document Name

Comment

The CAISO Planning Coordinator recommends the following changes to the draft FAC-014-3 :

- • Requirements R6 to R8 be removed from FAC-014-3.

- • Requirement R6 is misplaced and should be addressed in TPL-001, which governs Planning Assessments, rather than in FAC-014-3. Keeping “like” requirements together in one standard will avoid inconsistency, retain the overall context of the requirements, increase efficiency, and avoid undue regulatory burden.

- • Requirement R7 is also misplaced and should be addressed in TPL-001, which governs Planning Assessments, rather than in FAC-014-3. The comment above regarding keeping like requirements together applies here as well.

- • Requirement R8 should be removed from FAC-014-3 because FAC-014-3 makes the Reliability Coordinator (RC) the sole functional entity that establishes IROLs. As such, the PC and the TP that no longer establish IROLs should not be required to provide facilities that are critical to the derivation of IROLs and their contingencies to the impacted Transmission Owner (TO) and Generation Owner (GO) in accordance with CIP-002, CIP-014, etc. Requirement R5.6, which requires the RC to provide such information to the impacted TO and GO, should be sufficient to address their IROL-related needs. If the SDT determines there is Planning Assessment related information that the PC and TP should provide to the TO and GO, the requirement should be addressed in TPL-001 that governs their Planning Assessment, rather than in FAC-014, to keep like requirements together. Also, because TPL-001 does not allow planning event Contingency(ies) to cause instability, Cascading or uncontrolled separation that adversely impacts the reliability of the BES, Requirement R8 is inconsistent with TPL-001.

- • The phrase “ and that Planning Assessment performance criteria is coordinated with these methodologies.” be removed from the Purpose (Section 3) of FAC-014-3.

- • The Planning Coordinator and the Transmission Planner be removed from the Applicability Section (Section 4).

Likes	0
Dislikes	0
Response	
Thank you for your comment. As discussed in responses to our the previous posting of FAC-014-3 regarding the comments to R7 and R8, future consideration will be given to moving R6, R7 and R8 into TPL-001.	
Michael Jones - National Grid USA - 1	
Answer	
Document Name	
Comment	
RE: R5.2.4 The associated critical Contingency(ies): We request the Standard Drafting Team clarify the use of the word “critical” to describe Contingency(ies)” noting that “ critical Contingency(ies)” is undefined and opens Requirement R5, subpart 5.2.4 to interpretation.	
Please consider revising the subparts of 5.2 (Requirement R5) as follows:	
5.2.1 The value of the stability limit or IROL;	
5.2.2 The associated IROL Tv for any IROL;	
5.2.3 Identification of the Facilities that are critical to the derivation of the stability limit or the IROL and the associated Contingency(ies);	
5.2.4 A description of system conditions associated with the stability limit or IROL; and	
5.2.5 The type of limitation represented by the stability limit or IROL (e.g., voltage collapse, angular stability).	
Likes	0
Dislikes	0
Response	

Thank you for your comment. As per responses to comments in the previous posting the term “critical” is used throughout the standards especially pertaining to facilities. As Contingencies can comprise of such facilities, the SDT believes the language proposed in requirement part 5.2 is clear.

Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

Comments:

- · Suggest the coordination of methodologies, limits, criteria, etc, by the RC with the PC/TP should occur earlier in the RC’s process.
 - · Suggest the RC should be requesting review and comments from the PC/TP.
- o The RC should align as much as possible with the PC/TP’s criteria as the PC/TP determines what adequate investment into the system is.

Likes 0

Dislikes 0

Response

Thank you for your comment. The new and modified requirements were designed to simply require that the PC/TP is aware of the latest changes to SOL/IROLs and related information but does not specify when in the RC processes this should take place. This allows flexibility for the RC, and PC/TP to determine coordination details for carrying out the requirement.

Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman

Answer

Document Name	
Comment	
MPC supports MRO NERC Standards Review Forum comments.	
Likes	0
Dislikes	0
Response	
Please see response to MRO NERC Standards Review Forum comments.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	
Document Name	
Comment	
not at this time, thank you.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	
Document Name	
Comment	

Let move foward with the Standards Effieciency Review Porject to get rid of non Results based Standards, redunancy in Standards, and inefficiencies.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3

Answer

Document Name

Comment

No comments

Likes 0

Dislikes 0

Response

Thank you for your comment.

Leonard Kula - Independent Electricity System Operator - 2

Answer

Document Name

Comment

N/A.

Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	
Document Name	
Comment	
Thank you for the opportunity to provide comments.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
Minnesota Power agrees with MRO's NERC Standards Review Forum's (NSRF) comments.	
Likes	0
Dislikes	0
Response	

Please see response to MRC NERC Standards Review Forum.

Gladys DeLaO - CPS Energy - 1

Answer

Document Name

Comment

CPS Energy does not have any comments.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE does not have additional comments.

Likes 0

Dislikes 0

Response

Thank you for your comment.

Wayne Guttormson - SaskPower - 1

Answer

Document Name	
Comment	
	Support the MRO NSRF comments.
Likes	0
Dislikes	0
Response	
	Please see response to MRO NSRF.
sean erickson - Western Area Power Administration - 1	
Answer	
Document Name	
Comment	
	Requirement R6 is confusingly written, mainly because it confuses the concept of “criteria” and the use of components of criteria.
	Each Planning Coordinator and each Transmission Planner shall implement a documented process to use Facility Ratings, System steady-state voltage limits and stability criteria in its Planning Assessment of Near Term Transmission Planning Horizon that are equally limiting or more limiting than the Facility Ratings, System Voltage Limits and/or stability criteria used , as described in its respective Reliability Coordinator’s SOL methodology.
Likes	0
Dislikes	0
Response	
	Thank you for your comment.
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	

Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
David Jendras - Ameren - Ameren Services - 3	
Answer	
Document Name	
Comment	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
Response	
Please see response to EEI.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	

Alliant Energy supports the comments submitted by the MRO NSRF.	
Likes	0
Dislikes	0
Response	
Please see response to MRO NSRF	
Aidan Gallegos - PNM Resources - Public Service Company of New Mexico - 1	
Answer	
Document Name	
Comment	
Changes to R6-R8 may be perceived as an attempt of the SDT to modify TPL-001 and MOD-032. In addition, the proposed changes to FAC-014-3 appears to be an attempt to possibly require additional information and additional coordination between operations and planning. If the SDT feels strongly that these modifications to TPL-001 and MOD-032 are required to support the reliable operation of the BES Facilities, it may be of benefit of the SDT to submit a SAR for TPL-001 and MOD-032 instead of spreading the requirement out across multiple standards.	
Likes	0
Dislikes	0
Response	
Thank you for your comment. Future consideration will be given to these requirements moving into other standards.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	

Document Name

Comment

The IRC continues to believe that the drafting team should be given the opportunity to address efficiencies identified by the Standards Efficiency Review Project to reduce redundancy in the requirements and exposure to double jeopardy. FAC-013-3 R7 proposed to annually share CAP's with RC's and TOP's. IRO-017 R3 already has the requirement to share the CAP's with RC's. FAC-014-3, continues to say what should be included in that CAP, while TPL-001-4 R2.7 provides the initial requirement for completing a CAP and what should be included.

The IRC SRC continues to believe that the following additional changes to the language in the requirement:

- FAC-011-4 uses the phrase, "System Voltage Limits" (see FAC-011-4 R3). FAC-014 R6 uses a mix of terms such as "System steady state voltage limits" as well as "System Voltage Limits". The IRC SRC recommends that consistent terminology be used across these standards.
- FAC-011-4 uses the phrases, "stability limits", and "stability performance criteria" (see FAC-011-4 R4). FAC-014 R6 uses a mix of terms such as "stability criteria" or just "stability". The IRC SRC recommends that consistent terminology be used across these standards.

In addition, the IRC SRC continues to recommend that the following change be made to R6 to clarify the intent of the requirement:

R6. Each Planning Coordinator and each Transmission Planner shall implement a documented process to use Facility Ratings, System steady state Voltage Limits and stability criteria in its Planning Assessment of the Near Term Transmission Planning Horizon that are equally limiting or more limiting than the the criteria **for the use** of Facility Ratings, System Voltage Limits and stability criteria described in its respective Reliability Coordinator's SOL methodology.

The IRC continues to believe there is confusion with in this requirement. Facility Ratings are provided by asset owners. Is that the case for System Voltage Limits as well.

Finally, from a proofreading perspective, the IRC SRC notes there is an incomplete sentence (located as the last sentence in paragraph 2) on page 6 of the **Technical Rationale for Reliability Standard FAC-014-3** : “Those IROLs which may manifest in real time, due to forced outage...” that needs to be completed or deleted.

Likes 0

Dislikes 0

Response

Thank you for your comments. Regarding standards efficiency and redundancy, the drafting team understands the concerns and the responses made to the previous set of comments remains valid.

Thank you for noting the incomplete sentence for us to correct.

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer

Document Name

Comment

BPA continues to be concerned that the Technical Rationale document is apart from the Standard. There appears to be risks associated with this approach as neither an entity nor an auditor are required to consider Technical Rationale guidance when implementing requirements or performing audits, respectively. To remove this potential compliance issue, BPA believes language requiring Facility Ratings and system voltage limits to be equally limiting or more limiting than what’s provided by the TOP in accordance with its RC’s SOL methodology needs to be explicitly stated in the Standard.

Furthermore, BPA believes language requiring that criteria developed and documented for stability performance be equally limiting or more limiting than the criteria in its respective RC’s SOL methodology needs to be explicitly stated in the Standard.

In consideration of the SDT's comments with regard to the word ‘ensure’, BPA offers revisions to its comments regarding R6 to replace ‘ensure’ with ‘require’. See below.

R6. Each Planning Coordinator and each Transmission Planner shall **require** that Facility Ratings and system voltage limits used in its Planning Assessment of the Near Term Transmission Planning Horizon are equally limiting or more limiting than the Facility Ratings and system voltage limits provided by the TOP to its RC in accordance with its Reliability Coordinator’s SOL methodology.

In addition, each Planning Coordinator and each Transmission Planner shall **require** that criteria developed and documented for stability performance for its Planning Assessment of the Near-Term Transmission Planning Horizon are equally limiting or more limiting than the criteria for stability specified in its respective Reliability Coordinator’s SOL methodology. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

Likes 0

Dislikes 0

Response

Thank you for your comments. They were considered, however, the SDT believes the Requirement R6 and its rationale are clear enough as written.

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer

Document Name

Comment

ERCOT appreciates the Standard Drafting Team’s revision to the rationale accompanying Requirement R8.

For purposes of further clarification, is Requirement R8 intended to mean that only the owners of the facilities that comprise the planning event contingency(ies) that cause instability, Cascading or uncontrolled separation that adversely impacts the reliability of the BES as identified in the near-term planning assessment need to be notified that certain specific facilities they own are part of a planning event contingency that would cause cause instability, Cascading or uncontrolled separation that adversely impacts the reliability of the BES?

Likes 0

Dislikes	0
Response	
Thank you for your comment. The answer to your question is yes. In line with the SDT’s response to ERCOT’s comments in the previous posting, Requirement R8 is intended to clarify that only the TO and GO with identified facilities would be included in the communication from the PC & TP.	
Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	
Document Name	
Comment	
A new NERC time-horizon should be created, termed “Day-Ahead Operations” – operating and resource plans within the day ahead timeframe, to replace the Operations Planning Horizon applicability of R1 through R5 consistent with the intended horizon of SOL exceedance determinations.	
Likes	0
Dislikes	0
Response	
Thank you for your comment.	
Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5	
Answer	
Document Name	
Comment	

See comments from Southern Company.

Likes 0

Dislikes 0

Response

Please see response to Southern Company.