

Consideration of Comments

Project Name: 2018-03 Standards Efficiency Review Retirements | FAC-008-5
Comment Period Start Date: 11/30/2020
Comment Period End Date: 1/13/2021
Associated Ballot: 2018-03 Standards Efficiency Review Retirements FAC-008-5 IN 1 ST

There were 45 sets of responses, including comments from approximately 107 different people from approximately 81 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 Senior Director of Engineering and Standards [Howard Gugel](#) (via email) or at (404) 446-9693.

Questions

1. The SDT is proposing to retire Requirements R7 from FAC-008-3, as indicated in previously proposed FAC-008-4, and retain Requirement R8. Do you agree with the SDT's proposal to retire Requirement R7? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

Summary Response:

Proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "... Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the Standard Authorization Request (SAR) this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

2. If desired, please provide additional comments for the SDT to consider.

Summary Response:

Proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "... Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 or its related

VSL's would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

The retirement being proposed is a retirement to FAC-008-3. FAC-008-4 was remanded, but had gone through the development process so a new version number needed to be created for this development. It is, however a retirement to R7 of FAC-008-3. Developing a definition of jointly owned facilities may be better suited for the next Periodic Review team of FAC-008 to consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Since the BOT approved FAC-008-4 to be submitted to FERC for consideration, this revision must necessarily be FAC-008-5.

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
MRO	Dana Klem	1,2,3,4,5,6	MRO	MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administration	1,6	MRO
					Andy Crooks	SaskPower Corporation	1	MRO
					Bryan Sherrow	Kansas City Board of Public Utilities	1	MRO
					Bobbi Welch	Omaha Public Power District	1,3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Bobbi Welch	Midcontinent ISO	2	MRO
					Douglas Webb	Kansas City Power & Light	1,3,5,6	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Fred Meyer	Algonquin Power Co.	1	MRO
					John Chang	Manitoba Hydro	1,3,6	MRO
					James Williams	Southwest Power Pool, Inc.	2	MRO
					Jamie Monette	Minnesota Power / ALLETE	1	MRO
					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Sing Tay	Oklahoma Gas & Electric	1,3,5,6	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO
					Troy Brumfield	American Transmission Company	1	MRO
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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Karie Barczak	DTE Energy - DTE Electric	3	RF
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
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

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Helen Lainis	IESO	2	NPCC
					David Kiguel	Independent	7	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Nick Kowalczyk	Orange and Rockland	1	NPCC
					Joel Charlebois	AESI - Acumen Engineered Solutions	5	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						International Inc.		
					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	6	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Edison Co. of New York		
					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 Reliability Council	10	NPCC
					Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
					Brian Robinson	Utility Services	5	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Quintin Lee	Eversource Energy	1	NPCC
					Jim Grant	NYISO	2	NPCC
					John Pearson	ISONE	2	NPCC
					John Hastings	National Grid USA	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Nicolas Turcotte	Hydro-Quebec TransEnergie	1	NPCC
					Chantal Mazza	Hydro-Quebec	2	NPCC

1. The SDT is proposing to retire Requirements R7 from FAC-008-3, as indicated in previously proposed FAC-008-4, and retain Requirement R8. Do you agree with the SDT's proposal to retire Requirement R7? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

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

Answer No

Document Name

Comment

Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter. Consequently, I am balloting to retire what we can agree to retire.

Likes 0

Dislikes 0

Response

Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "... Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer Yes

Document Name	
Comment	
The NSRF agrees with the SER Retirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Michael Whitney - Northern California Power Agency - 3,4,5,6	
Answer	Yes
Document Name	
Comment	
Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter. Consequently, I am balloting to retire what we can agree to retire.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "... Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider.	

Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

Dennis Sismaet - Northern California Power Agency - 6

Answer Yes

Document Name

Comment

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Consequently, I am balloting to retire what we can agree to retire

Likes 0

Dislikes 0

Response

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Truong Le - Truong Le On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 5, 3; Chris Gowder, Florida Municipal Power Agency, 6, 4, 5, 3; Dale Ray, Florida Municipal Power Agency, 6, 4, 5, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 5, 3; - Truong Le

Answer Yes

Document Name

Comment	
Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter.	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "... Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.</p>	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
N/A.	
Likes	0
Dislikes	0
Response	

Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
None.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the retirement of Requirement R7 and retention of Requirement R8.	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Daniel Gacek - Exelon - 1	
Answer	Yes

Document Name	
Comment	
<p>Exelon concurs with the EEI comment, supporting the retirement of Requirement R7 and the retention of Requirement R8.</p> <p>Submitted on behalf of Exelon, Segments 1, 3, 5, 6</p>	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
W. Dwayne Preston - Austin Energy - 3	
Answer	Yes
Document Name	
Comment	
<p>Austin Energy agrees with the comments submitted by Platte River Power.</p> <p>However, Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.</p>	
Likes 1	Platte River Power Authority, 5, Archie Tyson
Dislikes 0	
Response	

Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.

Jun Hua - Austin Energy - 4

Answer Yes

Document Name

Comment

Austin Energy agrees with the comments submitted by Platter River Power.

However, Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.

Likes 1 Platte River Power Authority, 5, Archie Tyson

Dislikes 0

Response

Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.

Michael Dillard - Austin Energy - 5

Answer Yes

Document Name

Comment

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Likes 1	Platte River Power Authority, 5, Archie Tyson
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Dislikes 0	
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Response

Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.

Carl Pineault - Hydro-Quebec Production - 5

Answer	Yes
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Document Name	
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Comment

No comments

Likes 0	
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Dislikes 0	
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Response

Thank you for your support.

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

Answer	Yes
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	Yes
Document Name	
Comment	
MISO supports the retirement of Requirement R7 and the retention of Requirement R8.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Colleen Campbell - AES - Indianapolis Power and Light Co. - 3	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kjersti Drott - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Kim Thomas - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	

Likes	0
Dislikes	0
Response	
Thank you for your support.	
Bruce Reimer - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Jeremy Lorigan - Seminole Electric Cooperative, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Tammy Porter - Tammy Porter On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tammy Porter	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Tyson Archie - Platte River Power Authority - 5	
Answer	Yes

Document Name	
Comment	
Likes 2	Platte River Power Authority, 1, Thompson Matt; Platte River Power Authority, 3, Kiess Wade
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Joe Tarantino - Joe Tarantino On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Foung Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Joe Tarantino	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Jenjira Knernschild - Old Dominion Electric Coop. - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Andrea Barclay - Georgia System Operations Corporation - 3,4	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Dania Colon - Orlando Utilities Commission - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Maurice Paulk - Cleco Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
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	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Erin Green - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
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; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes	0
Response	
Thank you for your support.	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Paul Mehlhaff - Sunflower Electric Power Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	

Document Name	
Comment	
<p>Texas RE recommends removing “subject to Requirement R2” in Requirement R8. It should be clear that all Generator Owners (GO) shall provide Facility Ratings data when the Reliability Coordinators (RC), Planning Coordinators (PC), Transmission Planners (TP), Transmission Owners (TO), and Transmission Operators (TOP) identify a need for the data. Since Requirement R2 is already applicable to a large majority of GOs, removing the verbiage in Requirement R8, would eliminate the need for GOs to evaluate how a request for Facility Ratings data fits into the applicability specified within Requirement R8.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Modification for Requirement R8 may be better suited for a future Periodic Review team of FAC-008 to consider.</p>	
Andrew Gallo - Austin Energy - 6	
Answer	
Document Name	
Comment	
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Likes	0

Dislikes 0

Response

Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.

2. If desired, please provide additional comments for the SDT to consider.	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	
Document Name	
Comment	
None	
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; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike	
Answer	
Document Name	
Comment	
Tacoma Power supports the comments submitted by Platte River Power Authority with respect to modifying the language in FAC-008 R8 if retirement of the Requirement is not feasible.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. Please see responses to Platte River Power Authority. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Modification for Requirement R8 may be better suited for a future Periodic Review team of FAC-008 to consider.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	
Document Name	
Comment	
We recommend that FAC-008 be prioritized for another revision (new project) to act on the potential revisions/corrections that were identified in Project 2017-03 FAC-008-3 Periodic Review.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
No additional comments.	
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	
None.	
Likes 0	
Dislikes 0	
Response	
Joe Tarantino - Joe Tarantino On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Fong Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Joe Tarantino	
Answer	
Document Name	
Comment	
SMUD agrees with the comments submitted by Platter River Power.	
However, SMUD would like the SDT to consider providing clarificaiton to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.	

Likes 2	Austin Energy, 3, Preston W. Dwayne; Platte River Power Authority, 5, Archie Tyson
Dislikes 0	
Response	
<p>Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.</p>	
Tyson Archie - Platte River Power Authority - 5	
Answer	
Document Name	
Comment	
<p>Platte River agrees with the SDT’s recommendation to retire Requirement R7 from FAC-008-3 in response to FERC Oder No. 873. Platte River would like R8 to be retired in its entirety as we believe sufficient technical justification was provided for its retirement by NERC in their June 7, 2019 petition. If R8 cannot be retired in its entirety, we recommend revising R8 as detailed below.</p> <p>Platte River recommends removing item 2) Total Transfer Capability (TTC) from Requirement 8.2, as TTC is primarily used for commercial operations not reliability. As stated in NERC’s June 7, 2019 petition: “Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to SOLs and IROLs. If a scheduled interchange would violate SOLs or IROLs, the real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits.” This observation is reinforced by NERC’s statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry.</p> <p>Additionally, Platte River agrees with NERC’s justification for the proposed retirement of the 56 MOD A Reliability Standards and their associated requirements which includes the rationale that these standards are commercial in nature. If/when the MOD A reliability</p>	

standards are retired, determining TTC will no longer be required by any NERC reliability standard. Removing TTC at this time would be forward looking and beneficial as to not have FAC-008-5 referencing an out of date term.

Platte River recommends removing or, at a minimum, defining 3) an impediment to generator deliverability. This term is not defined in the NERC Glossary of Terms, and to date, ERO-endorsed guidance is not available for entities to reference for defining generator deliverability. Due to the differences in size and complexity of registered entities and individual generating units, generator deliverability can vary widely. This creates inconsistency and confusion for reporting entities as well as regional entity staff.

Platte River recommends removing item 4) An impediment to service to a major load center from Requirement 8.2. Major load center is not defined in the NERC Glossary of Terms, and to date, ERO-endorsed guidance is not available for entities to reference for defining a major-load center. Due to the differences in size and complexity of registered entities, a major load center can vary widely. This creates inconsistency and confusion for reporting entities as well as regional entity staff.

Therefore, Platte River would like the SDT to consider the following proposed changes to Requirement R8, sub requirement 8.2.

Proposed changes to Requirement R8 of FAC-008-5:

R8: Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

8.1. As scheduled by the requesting entities:

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 the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing an Interconnection Reliability Operating Limit (IROL).

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

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

In conclusion, Platte River believes the operation of the Bulk Electric System (BES) is rooted in determining and operating within SOL's and IROL's. Requirement 8.1 addresses the sharing of SOL's, and Platte River's recommendation for Requirement 8.2 addresses the critical nature of IROL's. Requirement 8.2, as currently written, strays from these two well-known and widely used terms.

Likes 5	Tarantino Joe On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Platte River Power Authority, 1, Thompson Matt; Platte River Power Authority, 3, Kiess Wade; Austin Energy, 3, Preston W. Dwayne; Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merre
Dislikes 0	

Response

Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "... Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

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

Answer	
Document Name	
Comment	

None.	
Likes	0
Dislikes	0
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
<p>As in its previous NOPR response, BPA agrees with FERC’s assertion that Requirement R8’s direction to communicate with Transmission Owners is not found in MOD-032, TOP-001, and/or IRO-010, therefore is a provision to be retained in FAC-008. BPA does, however, agree with the comments submitted by Platte River Power Authority and recommends that Requirement R8 be revised to add clarity and reduce undue burden on reporting entities.</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. Please see responses to Platte River Power Authority. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Modification for Requirement R8 may be better suited for a future Periodic Review team of FAC-008 to consider.</p>	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	
Document Name	

Comment	
N/A.	
Likes 0	
Dislikes 0	
Response	
Tammy Porter - Tammy Porter On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tammy Porter	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	
Document Name	
Comment	
<p>Since R8 will not be retired despite industry support, Reclamation recommends the drafting team seek to simplify R8 as a means of addressing industry opinion on its lack of value. Revising R8 could eliminate the difficulties of interpreting this requirement by narrowing</p>	

the focus to address only the portions described in FERC’s rationale for rejecting its retirement. Reclamation recommends the language of R8 be simplified to require TOs and GOs subject to R2 to identify the most limiting Element and second most limiting Element for each solely or jointly owned Facility.

Likes	0
Dislikes	0

Response

Thank you for your comment. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Modification for Requirement R8 may be better suited for a future Periodic Review team of FAC-008 to consider.

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

Answer

Document Name

Comment

N/A

Likes	0
Dislikes	0

Response

Jeremy Lorigan - Seminole Electric Cooperative, Inc. - 3

Answer

Document Name

Comment

R8 limits the provision of information from the TO (and applicable GO) to ONLY “*its associated* RC, PC, TP, TO, and TOP” and does not have any provision for *adjacent* RCs, PCs, TPs, TOs, or TOPs to request similar information. I would be inclined to include language that adjacent entities can request this information which would be in-line with what FERC has issues in its NOPR on 11/19/2020 on “Managing Transmission Line Ratings.”

Also, I do disagree in part with the VSL’s for R8 in that there is no quantitative way to measure whether an entity only provide “85%” of the information associated with a facility rating vs. “90%” and vs. “87%”. I agree with the quantitative measure on whether the entity provided it within the 30 calendar days or within the agreed to time-frame.

Likes 0

Dislikes 0

Response

Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that “... Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated” (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 or its related VSL’s would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE noticed an apparent redundancy in the Severe VSL language. The proposed Severe VSL language indicates that entities providing less than 85% of the information required under FAC-008-5, R8 Part 8.1 commit a “Severe” level violation. Correspondingly, the final proposed Severe VSL category indicates that an entity’s complete failure to provide rating information required pursuant to FAC-008-5, R8 Part 8.1 also constitutes a “Severe” level violation. From Texas RE’s perspective, because an entity has already committed a “Severe” violation when it submits less than 85% of the information required under FAC-008-5, R8 Part 8.1, the additional language in the final section addressing a complete failure is wholly subsumed within the 85% or less provision. As such, Texas RE recommends its removal.

Texas RE also noticed a space between 85 and % in the second to last sentence in the Severe VSL section.

Likes	0
Dislikes	0

Response

Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that “... Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated” (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 or its related VSL’s would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

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

Answer	
Document Name	
Comment	

None.	
Likes	0
Dislikes	0
Response	
Dennis Sismaet - Northern California Power Agency - 6	
Answer	
Document Name	
Comment	
<p>In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process.</p> <p>Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be Version 4 not Version 5. To my knowledge FERC did not approve the prior proposed V4. See item section 39 at link Federal Register :: Electric Reliability Organization Proposal To Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review</p>	
Likes	0
Dislikes	0
Response	
<p>Thank you for your comment. The retirement being proposed is a retirement to FAC-008-3. FAC-008-4 was remanded, but had gone through the development process so a new version number needed to be created for this development. It is, however a retirement to R7 of FAC-008-3. Developing a definition of jointly owned facilities may be better suited for the next Periodic Review team of FAC-008 to consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as</p>	

retirements and references to requirements being retired. Since the BOT approved FAC-008-4 to be submitted to FERC for consideration, this revision must necessarily be FAC-008-5.

Michael Whitney - Northern California Power Agency - 3,4,5,6

Answer

Document Name

Comment

In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process.

Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be Version 4 not Version 5. To my knowledge FERC did not approve the prior proposed V4. See item section 39 at link [Federal Register :: Electric Reliability Organization Proposal To Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review](#)

Likes 0

Dislikes 0

Response

Thank you for your comment. The retirement being proposed is a retirement to FAC-008-3. FAC-008-4 was remanded, but had gone through the development process so a new version number needed to be created for this development. It is, however a retirement to R7 of FAC-008-3. Developing a definition of jointly owned facilities may be better suited for the next Periodic Review team of FAC-008 to consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Since the BOT approved FAC-008-4 to be submitted to FERC for consideration, this revision must necessarily be FAC-008-5.

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

Answer

Document Name

Comment

In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process.

Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be V4. To my knowledge FERC did not approve the prior proposed V4.

Likes 0

Dislikes 0

Response

Thank you for your comment. The retirement being proposed is a retirement to FAC-008-3. FAC-008-4 was remanded, but had gone through the development process so a new version number needed to be created for this development. It is, however a retirement to R7 of FAC-008-3. Developing a definition of jointly owned facilities may be better suited for the next Periodic Review team of FAC-008 to consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Since the BOT approved FAC-008-4 to be submitted to FERC for consideration, this revision must necessarily be FAC-008-5.

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	

End of Report