Unofficial Comment Form

Project 2021-08 Modifications to FAC-008

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project** **2021-08 Modifications to FAC-008 Standard Authorization Request (SAR).** Comments must be submitted by **8 p.m. Eastern, Thursday, January 27, 2022.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project2021-08ModificationstoFAC-008.aspx). If you have questions, contact Senior Standards Developer, [Ben Wu](mailto:ben.wu@nerc.net) (via email), or at 404-446-9618.

## Background Information

As currently written, the FAC-008 Reliability Standard and associated defined terms “Facility” and “Element” have been interpreted by some to mean that only electrical components may be considered when developing Generator Facility Ratings under R1. This could lead to planning and operational entities being provided Generator Facility Ratings that are higher than the actual output the plant is capable of, which could be detrimental to reliability during actual system emergencies. Explicitly allowing the inclusion of mechanical elements in the development of Facility Ratings will ensure Generators are rated to their most limiting element.

Further, the FAC-008-3 non-formal use of the term “jointly owned” is ambiguous when compared with the industry legacy use of “jointly owned” as a purely financial and contractual obligation. This lack of clarity of intent of the standard could cause risk of facility rating gaps, misunderstanding of rating overlap requirements, or gaps in facility rating coordination that could be resolved by clearly defining the technical expectations of the term “jointly owned”.

## Questions

1. Do you agree with the proposed scope as described in the SAR? If you do not agree, or if you agree but have comments or suggestions for the project scope, please provide your recommendation and explanation.

Yes

No

Comments:

1. Provide any additional comments for the SAR drafting team to consider, if desired.

Comments: