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 draft one of Reliability Standard **FAC-008-6 – Facility Ratings** by **8 p.m. Eastern, Thursday, October 19, 2023.**

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 470-542-6882.

## 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 that the modification of Requirement R6 has clarified the meaning of “jointly owned” and clarified that Requirement R6 is a risk-based Requirement?

Yes

No

Comments:

1. Do you agree that the new Requirement R9 has clarified the meaning of “consistent” in relation to defining the processes?

Yes

No

Comments:

1. Do you agree that the modifications made in FAC-008-6 are cost effective?

Yes

No

Comments:

1. Do you agree that the Implementation Plan for revised FAC-008-6 is appropriate?

Yes

No

Comments:

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

Comments: