

Comment Report

Project Name: 2020-05 Modifications to FAC-001 and FAC-002 | Draft 1
Comment Period Start Date: 12/7/2021
Comment Period End Date: 1/31/2022
Associated Ballots: 2020-05 Modifications to FAC-001 and FAC-002 FAC-001-4 and FAC-002-4 IN 1 ST
2020-05 Modifications to FAC-001 and FAC-002 Implementation Plan IN 1 OT

There were 58 sets of responses, including comments from approximately 129 different people from approximately 83 companies representing 7 of the Industry Segments as shown in the table on the following pages.

Questions

1. The SDT proposes “qualified change” to replace “material modification”. Do you agree that this is an appropriate change, eliminating confusion with the FERC defined term? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.
2. The SDT proposes the Planning Coordinator (PC), in FAC-002-4 Requirement R6, as the entity to define what a qualified change is. Do you agree that the PC is the appropriate entity? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.
3. The SDT proposes the new requirement R6 in FAC-002-4 and associated VRF and VSL. Do you agree that the associate VRF and VSL levels are appropriate? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.
4. The SDT proposes that the modifications in FAC-001-4 and FAC-002-4 meet the SAR in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.
5. The SDT is proposing a 12-month implementation plan. If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.
6. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
BC Hydro and Power Authority	Adrian Andreoiu	1	WECC	BC Hydro	Hootan Jarollahi	BC Hydro and Power Authority	3	WECC
					Helen Hamilton Harding	BC Hydro and Power Authority	5	WECC
					Adrian Andreoiu	BC Hydro and Power Authority	1	WECC
Portland General Electric Co.	Daniel Mason	6		PGE FCD	Ryan Olson	Portland General Electric Co.	5	WECC
					Nathaniel Clague	Portland General Electric Co.	1	WECC
					Angela Gaines	Portland General Electric Co.	3	WECC
					Daniel Mason	Portland General Electric	6	WECC
Public Utility District No. 1 of Chelan County	Diane Landry	1		CHPD	Meaghan Connell	Public Utility District No. 1 of Chelan County	5	WECC
					Joyce Gundry	Public Utility District No. 1 of Chelan County	3	WECC
					Glen Pruitt	Public Utility District No. 1 of Chelan County	6	WECC
Elizabeth Davis	Elizabeth Davis		RF	ISO/RTO Council (IRC) Standards Review Committee (SRC)	Mike Del Viscio	PJM	2	RF
					Becky Davis	PJM	2	RF
					Gregory Campoli	New York Independent System Operator	2	NPCC

					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Helen Lainis	IESO	2	NPCC
					Bobbi Welch	Midcontinent ISO, Inc.	2	RF
					Al Miremadi	CAISO	2	WECC
					Al Miremadi	CAISO	2	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
					Susan Sosbe	Wabash Valley Power Association	3	RF
					Amber Skillern	East Kentucky Power Cooperative	1	SERC
					Jennifer Bray	Arizona Electric Power Cooperative, Inc.	1	WECC
					Nick Fogleman	Prairie Power, Inc.	1	SERC
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Patricia Ireland	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	3,5	MRO
					Fred Meyer	Algonquin Power Co.	3	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	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
					David Heins	Omaha Public Power District	1,3,5,6	MRO
					George Brown	Acciona Energy North America	5	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
Michael Johnson	Michael Johnson		WECC	PG&E All Segments	Marco Rios	Pacific Gas and Electric Company	1	WECC

					Sandra Ellis	Pacific Gas and Electric Company	3	WECC
					James Mearns	Pacific Gas and Electric Company	5	WECC
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
Eversource Energy	Quintin Lee	1		Eversource Group	Quintin Lee	Eversource Energy	1	NPCC
					Christopher McKinnon	Eversource Energy	3	NPCC
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	MRO,SPP RE,WECC	SPP RTO	Shannon Mickens	Southwest Power Pool Inc.	2	MRO
					Matt Harward	Southwest Power Pool Inc.	2	MRO
					Nathan Bean	Southwest Power Pool Inc.	2	MRO
					Mason Favazza	Southwest Power Pool Inc.	2	MRO
					Chris Jamieson	Southwest Power Pool Inc.	2	MRO

					Melanie Hill	Southwest Power Pool Inc.	2	MRO
					Scott Jordan	Southwest Power Pool Inc.	2	MRO
					Jonathan Hayes	Southwest Power Pool Inc.	2	MRO
					Jason Davis	Southwest Power Pool Inc.	2	MRO
					Juliano Freitas	Southwest Power Pool Inc.	2	MRO
					Ellen Cook	Southwest Power Pool Inc.	2	MRO
					Jeff McDiarmid	Southwest Power Pool Inc.	2	MRO
					Charles Hendrix	Southwest Power Pool Inc.	2	MRO
Western Electricity Coordinating Council	Steven Rueckert	10		WECC Entity Monitoring	Steve Rueckert	WECC	10	WECC
					Phil O'Donnell	WECC	10	WECC
FirstEnergy - FirstEnergy Corporation	Tricia Bynum	6		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Mark Garza	FirstEnergy - FirstEnergy Corporation	4	RF
					Robert Loy	FirstEnergy - FirstEnergy Corporation	5	RF

1. The SDT proposes “qualified change” to replace “material modification”. Do you agree that this is an appropriate change, eliminating confusion with the FERC defined term? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.

Diane Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer No

Document Name

Comment

Use of the word “change” in the new definition is potentially misleading. For any “modification” of an interconnection, there is both a change in the physical system (topology, technology, etc.) as well as a change in system performance. The new term “qualified change” could be interpreted to include performance criteria as opposed to changes in topology or technology. In other words, the intent of the new definition isn’t to require the PC to define system performance criteria for which to evaluate modified/changed interconnections, but rather to define what modifications/changes will require (trigger) system studies prior to placing them in service. An alternate term could be “Qualified System Modification (QSM)” to help cue the reader that this deals with the modification of the system (as was the term originally), not the subsequent change in impact to the system (i.e. not the performance criteria to evaluate against).

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer No

Document Name

Comment

No, this will continue to add confusion and result in inconsistent results based on a Planning Coordinator's definition. Entities that have multiple Planning Coordinators may have significant trouble in managing consistency, especially when these are in different Regions. This will also be problematic during compliance audits where the burden will be on the entity to show it met each PC definition, no matter how badly the definition is written and how ambiguous it may be.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer No

Document Name	
Comment	
<p>While the proposed strategy itself may be sound overall, we are concerned by what the exact definition of “qualified change” might be after being developed by each Planning Coordinator. Transmission Planners may or may-not agree with a PC’s definition, and those entities would need to be provided an opportunity for the PC to hear their concerns, and be provided an opportunity to help shape the Planning Coordinator’s definition. In addition, the TP should have the ability to perform a determination as to whether they believe a system impact has occurred via a reliability impact study within FAC-002.</p> <p>AEP appreciates the efforts of the Standard Drafting Team. We would like them to know that AEP’s Negative votes on the proposed revisions for FAC-001 and FAC-002 are solely driven by the concerns expressed in our response to Question 1 (above). We hope these concerns might be addressed in a way that allows us to support this effort with our Affirmative votes.</p>	
Likes	0
Dislikes	0

Response	
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Robert Hirschak - Cleco Corporation - 6	
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Answer	No
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Document Name	
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Comment	
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Has there been issues of non-compliance due to the current terms? If so, please provide examples.

Likes	0
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Dislikes	0
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Response	
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Richard Jackson - U.S. Bureau of Reclamation - 1	
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Answer	No
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Document Name	
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Comment	
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Reclamation does not support replacing the term “materially modified.” As stated in the NERC Rules of Procedure, terms that are not specifically defined are to be used in their ordinary and commonly understood meaning. The ordinary and commonly understood meaning of “materially” is “substantially” or “considerably.” The ordinary and commonly understood meaning of “modified” is “changed.” Reclamation acknowledges that FERC’s Standardization of Generator Interconnection Agreements and Procedures uses the term “Material Modification” and that it is this similarity with “materially modified” that is the basis for the FAC-001 and FAC-002 SAR, but Reclamation observes two problems with conflating these terms.

First, a defined term like “Material Modification” in one situation should not be interpreted via conjugation to impose confusion upon a different situation. That is, although “Material Modification” and “materially modified” are similar, it is not reasonable to imply that they are related or connected. Second,

the FERC definition of “Material Modification” is essentially circular, i.e., “modifications that have a material impact...” Reclamation observes it is likely that FERC relies on the plain meanings of both “modification” and “material,” as well as discussions between the Transmission Provider and the Interconnection Customer to determine the appropriate outcome on the queue. Reclamation recommends the procedures addressed by FAC-001 and FAC-002 are no different. Facility owners should coordinate with the appropriate entities that perform the Planning Coordinator, Transmission Operator, and/or Balancing Authority functions to identify the significance of changes and meet the pertinent interconnection requirements.

Likewise, Reclamation observes it is confusing to not define “qualified change” in FAC-001 and FAC-002 or in the NERC Glossary of Terms. This term is critical to a substantial portion of the activities necessary to comply with FAC-001 and FAC-002 and should not be contained externally or buried at the end of all the requirements that rely on it. Reclamation observes that entities with multiple different Planning Coordinators could be subject to multiple different definitions of “qualified change” if the definition is left up to each Planning Coordinator.

Reclamation also observes there are grammatical inconsistencies in the FAC-001 R3 and R4 subparts, as well as problems with the implementation of the proposed language “seeking to make a qualified change....” It is the entities that own the Facilities that are seeking to make the changes, not the Facilities (i.e., equipment) seeking to make the changes. To correct these problems, Reclamation offers the following language:

FAC-001 R3.1 “Procedures for coordinating studies and identifying the impacts on affected systems for new interconnections or existing interconnections sought to be changed in accordance with the definition of Qualified Change.”

FAC-001 R3.2 “Procedures for notifying those responsible for the reliability of affected systems of new interconnections or existing interconnections sought to be changed in accordance with the definition of Qualified Change.”

FAC-001 R3.3 “Procedures for confirming with those responsible for the reliability of affected systems that new Facilities or existing Facilities sought to be changed in accordance with the definition of Qualified Change are within a Balancing Authority Area’s metered boundaries.”

FAC-001 R4.1 “Procedures for coordinating studies of new interconnections and their impacts on affected systems.”

FAC-001 R4.3 “Procedures for confirming with those responsible for the reliability of affected systems that new Facilities or existing Facilities sought to be changed in accordance with the definition of Qualified Change are within a Balancing Authority Area’s metered boundaries.”

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer

No

Document Name

Comment

Modifying the language in FAC-001 & FAC-002 to remove potential ambiguity between the referenced FERC definition and that which is relevant in NERC Reliability Standards is appropriate and prudent. However, Requirement R6 in the proposed revision to FAC-002 may not provide the clarity intended. As proposed, R6 will allow each Planning Coordinator to have its own definition of “qualified change” in its procedures and criteria, which would likely lead to significant differences in this interpretation across the system. This will make collaborating between various Planning Coordinators, Transmission Planners, and Facility owners difficult and confusing when determining impacts to System Reliability due to a “qualified change”. It is recommended that the SDT mitigate this issue by proposing a NERC glossary term for “qualified change”, or that the proposed edits to FAC-002 include the establishment of criteria for what does and does not constitute as a “qualified change.” This should provide the appropriate consistency in interpretation across industry.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Duke Energy agrees with the concept presented in the SAR, however, it doesn't agree with the phrase "qualified change". A suggested alternative is "technically substantive change" to distinguish it from FERC terminology "material modification" that relates to cost of projects. By "technically substantive", Duke Energy is referring to project changes that would significantly impact the electrical behavior of the transmission system.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Comments submitted on behalf of Exelon for Segments 1, 3, 5, 6

The difference in term may be appropriate, but additional clarity is needed to ensure the new term addresses the confusion with the FERC defined term. See comments to question 2 for more detail on suggested changes to address.

Likes 0

Dislikes 0

Response

John Pearson - ISO New England, Inc. - 2

Answer No

Document Name [2020-05_Mod_to_FAC-001_and_FAC-002_Unofficial_Comment_Form_12072021_FINAL.docx](#)

Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Malon - Jennifer Malon On Behalf of: Derek Silbaugh, Black Hills Corporation, 3, 5, 1, 6; Don Stahl, Black Hills Corporation, 3, 5, 1, 6; Seth Nelson, Black Hills Corporation, 3, 5, 1, 6; - Jennifer Malon	
Answer	Yes
Document Name	
Comment	
BHC agrees that "material modification" should be replaced. However, additional clarification to the term "qualified change" would be helpful for consistent application across ERO enterprise. A guideline providing additional specification and examples would be value-add.	
Likes 0	
Dislikes 0	
Response	
Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1	
Answer	Yes
Document Name	
Comment	
MEC supports the MRO NSRF comments.	
Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	

None

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer

Yes

Document Name

Comment

Entergy has no additional comments.

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

Southern Company supports the use of the term “Qualified Change” as it adds a clear distinction from “material modification” used in the pro forma Open Access Transmission Tariff.

Likes 0

Dislikes 0

Response

Adrian Andreoiu - BC Hydro and Power Authority - 1, Group Name BC Hydro

Answer

Yes

Document Name

Comment

BC Hydro appreciates the drafting teams efforts and opportunity to comment.

The proposed Requirement R6 of FAC-002-4 Draft 1 requires the Planning Coordinator to define "qualified change". This seems to imply that the determination of what constitutes a "qualified change" is to be made in one pass, based on the R6-established definition, without an opportunity to conduct a technical analysis. BC Hydro believes that developing a robust definition will be technically challenging, and recommends that a determination process for a "qualified change" be included as part of 2020-05 FAC-001 and FAC-002 revisions.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

Yes

Document Name

Comment

This change can reduce on identified ambiguity.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Yes

Document Name

Comment

The North American Generator Forum (NAGF) has no additional comments.

Likes 0

Dislikes 0

Response

Quintin Lee - Eversource Energy - 1, Group Name Eversource Group

Answer

Yes

Document Name

Comment

Generally it is helpful avoid conflating terms between standards and tariffs, but this cannot be answered until the PC defines 'qualified change.'

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster 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; - Alan Kloster

Answer

Yes

Document Name

Comment

Evergy supports and incorporates by reference Edison Electric Institute's (EEI) response to Question 1.

Likes 0

Dislikes 0

Response

Amy Casuscelli - Amy Casuscelli On Behalf of: Dean Schiro, Xcel Energy, Inc., 1, 5, 3; - Amy Casuscelli

Answer

Yes

Document Name

Comment

Xcel Energy supports the comments of EEI.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI agrees that the proposed term "qualified change" addresses the concerns and confusion identified with the use of the term "material modification".

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Yes

Document Name

Comment

Ameren agrees with and supports the comments provided by EEI.

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

Recommendation to the SDT: The NERC Glossary of Terms does not have a definition for “material modification” and the SDT does not intend to add “qualified change” to the glossary. Without the addition of “qualified change” to the NERC Glossary of Terms, the ambiguity that exists with the “material modification” will continue to exist with the revised standards. Recommend the SDT utilize FAC-002-4, requirement R6 and measure M6, to develop the intent of “qualified change” and incorporate it into the NERC Glossary of Terms. (NERC Glossary of Terms Example for the SDT: “Qualified Change - For the purpose of studying the impact of interconnecting new or changed facilities on the Bulk Electric System, each Planning Coordinator is required to maintain a publicly available definition of “qualified change” for the purposes of facility interconnection.”)

Likes 0

Dislikes 0

Response

Mo Derbas - Sempra - San Diego Gas and Electric - 1

Answer

Yes

Document Name

Comment

SDG&E proposes the insertion of the phrase “in coordination with the Transmission Planner” as follows (see bolded and italicized statement):

FAC-001-4, R3-3.1:

Procedures for coordinated studies and identifying the impacts on affected systems for new interconnections, or existing interconnections seeking to make a qualified change as defined by the Planning Coordinator, ***in coordination with the Transmission Planner***, under Reliability Standard FAC-002-4 Requirement R6

FAC-002-4, R6:

Each Planning Coordinator, ***in coordination with the Transmission Planner***, shall maintain a publicly available definition of qualified change for the purposes of facility interconnection.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Yes

Document Name

Comment

PG&E supports the comments provided by the Edison Electric Institute (EEI) that the proposed term “qualified change” addresses the concerns and confusion with the term “material modification”.

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

No additional suggestions for improvement.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

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

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nazra Gladu - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

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

Leslie Hamby - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bradley Collard - Pedernales Electric Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tricia Bynum - FirstEnergy - FirstEnergy Corporation - 6, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bryan Koyle - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
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

Jamie Monette - Allete - Minnesota Power, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Dwanique Spiller On Behalf of: Kevin Salsbury, Berkshire Hathaway - NV Energy, 5; - Dwanique Spiller

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**Michael Jang - Seattle City Light - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Daniel Mason - Portland General Electric Co. - 6, Group Name PGE FCD****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Paul Mehlhaff - Sunflower Electric Power Corporation - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Tom Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Council (IRC) Standards Review Committee (SRC)

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tammy Porter - Oncor Electric Delivery - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Dana Showalter - Electric Reliability Council of Texas, Inc. - 2****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP RTO****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Teresa Krabe - Lower Colorado River Authority - 1,5****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Darcy O'Connell - California ISO - 2

Answer

Document Name

Comment

CAISO agrees with comments submitted by the ISO/RTO Counsel (IRC) Standards Review Committee

Likes 0

Dislikes 0

Response

2. The SDT proposes the Planning Coordinator (PC), in FAC-002-4 Requirement R6, as the entity to define what a qualified change is. Do you agree that the PC is the appropriate entity? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Comments submitted on behalf of Exelon for Segments 1, 3, 5, 6

While we agree the PC can perform the role of defining “qualified change”, more can be done by the SDT to clarify requirements related to “material modifications” of Facilities. The currently proposed changes to FAC-001 and FAC-002 do not provide requirements for the PC to define “qualified change” with any more clarity than “material modification” has at this time. The SDT should consider outlining minimum requirements for a PC defined “qualified change”. This could be commonly agreed to circumstances that would require study by all PCs. From this minimum set of requirements PCs could then add additional requirements relevant to their planning areas. If left open ended for PCs to define, there is a chance that the difference in terms “qualified change” and “materially modified” would not address the issue the Project is trying to address. Adding minimum requirements provides more certainty and consistency across PCs.

The revised standards should also include guidance for change management by allowing the impacted entities to have some period of time to align with modifications to the PC’s definition of “qualified change” – perhaps 180 days from the time the change is posted. As written, if the PC makes changes to its definition of “qualified change”, there is no period of time for entities to revise their internal procedures to match.

Consider requiring the PCs to work with the TPs and other stakeholders to create and modify the definition of “qualified change”.

Likes 0

Dislikes 0

Response

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer No

Document Name

Comment

There is a difference between a definition for impacts to the BES system only and to a TP’s system, which could be more expansive.

- ATC is not vertically integrated, so we need the ability to receive appropriate information from our customers when a request to modify a connection (D-T, T-T, or G-T) to our transmission system occurs.

- If the PC is the definer, then the PC needs to closely coordinate the definition with TPs, especially if the TP is not vertically integrated.
- ATC would differentiate between generation (PC definition of qualified change may be ok) and distribution (ATC needs to have more control over definition) connections.
- ATC has a Generating Facilities Modification Notification (GFMN) process that defines applicable changes ATC needs to receive regardless of FAC-002 applicability (gives us the most up to date information on units connected to our system).
- ATC has our own connection change modification criteria for determining FAC-002 applicability documented in a Criteria document.

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer

No

Document Name

Comment

It also seems appropriate that the TP have a role in determining what a “qualified change” is, but that is not provided for in the R6 proposal. A NERC glossary term for “qualified change” is preferred and would make this more of a moot point but, in the absence of that, wording similar to the MOD-032 standard where the criteria/definition is jointly developed (by the PC and its TPs) would be more appropriate.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Reclamation recommends the definition of “Qualified Change” be contained within the NERC Glossary of Terms. As stated in the response to Question 1, Reclamation does not support a process that would allow the definition of “qualified change” to vary by entity or to change with little notice. Such ambiguity does not resolve the confusing situation that allegedly exists with FAC-001 and FAC-002 using the term “materially modified;” it merely replaces one ambiguous term with another.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

The primary argument behind the PC as the appropriate entity is "one size fits all". The TO is best situated and best capable to determine what "qualified change" is as it applies to and how it impacts the TO's delivery system.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer No

Document Name

Comment

Entities may use multiple Planning Coordinators, some may be in different Regions. For consistency, there should be one definition, not a patchwork of poorly written and ambiguous definitions. This will put added burden and risk on the entities from the compliance staff who may disagree with the interpretations of the PC definitions.

Likes 0

Dislikes 0

Response

Diane Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer No

Document Name

Comment

The Planning Coordinator may be the appropriate entity for this definition, however more clarification is needed to ensure the definition is being applied correctly. It is easy to see how in areas where there are multiple TO's under a common PC that FAC-002-4 R6 would be useful, but what about circumstances where PC to PC coordination is required? There are many vertically integrated entities whereby the PC is the Transmission Planner as well as the Transmission Owner and adjacent systems (i.e. "affected systems") are in another PC (see comments for #6 below regarding use of the term "affected systems"). For an interconnection request in one PC's area, would that PC apply their own definition of a "qualified change" when evaluating impacts on a neighboring PC's systems? It would be onerous to attempt to apply neighboring criteria when performing system studies. If the intent to apply internal criteria to external systems, it should be clearly stated.

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

No additional suggestions for improvement.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer

Yes

Document Name

Comment

PG&E supports the comments provided by the Edison Electric Institute (EEI) that the Planning Coordinator (PC) is the appropriate entity to define what is a qualified change.

PG&E also agrees with the EEI input that the SDT consider adding language to Requirement R6 that would ensure the PCs coordinate with Transmission Planners (TP) when defining the term

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

Yes

Document Name

Comment

As recognized in the Project 2020-05 SAR, FERC provides a definition for “Material Modification” in its pro forma Large Generator Interconnection Procedures (LGIP) and Small Generator Interconnection Procedures (SGIP). For the purpose of these procedures, FERC defines a Material Modification as “a modification that has a material impact on the cost or timing of any Interconnection Request with a later queue priority date.” FAC-001 requires Transmission Owners to have documented Facility interconnection requirements. It is likely that many registered Transmission Owners (within the U.S. at least) consider their LGIP as supporting evidence for R1, part 1.1 (generation Facilities). With the proposed addition of Requirement R6 to FAC-002-4, the Planning Coordinator will have the responsibility to define what a “qualified change” is. How will a “qualified change” definition developed by the PC be reconciled with the TO’s responsibility to maintain Facility interconnection requirements for generators seeking to interconnect new generation (or modify existing generation connected) to their facilities? Will the TO (or FERC “Transmission Provider”) need to incorporate the PC’s definition of a “qualified change” into their LGIP? Would this need to be approved by FERC and perhaps incorporated into FERC’s pro forma LGIP and SGIP as well?

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer Yes

Document Name

Comment

Ameren agrees with and supports the comments provided by EEI.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

EEI agrees that the Planning Coordinator(PC) is the appropriate entity to define what a qualified change is, however, we also recommend that the SDT consider adding language to Requirement R6 that would ensure PCs coordinate with Transmission Planners when defining this term.

Likes 0

Dislikes 0

Response

Amy Casuscelli - Amy Casuscelli On Behalf of: Dean Schiro, Xcel Energy, Inc., 1, 5, 3; - Amy Casuscelli

Answer Yes

Document Name

Comment

Xcel Energy supports the comments of EEI.

Likes 0

Dislikes 0

Response

Daniel Mason - Portland General Electric Co. - 6, Group Name PGE FCD

Answer Yes

Document Name

Comment

PGE agrees that standardization of the definition at the PC level removes ambiguity due to an auditors interpretation. PGE has some some concern about the lack of a formalized process to address disputes during the process to define the term.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster 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; - Alan Kloster

Answer Yes

Document Name

Comment

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

Likes 0

Dislikes 0

Response

Quintin Lee - Eversource Energy - 1, Group Name Eversource Group

Answer	Yes
Document Name	
Comment	
The PC should be involved but should not be solely responsible for the definition. Instead R6 should direct the PC to develop and maintain the definition in consultation with Transmission Planner(s) as applicable.	
Likes 0	
Dislikes 0	
Response	
Michael Jang - Seattle City Light - 1	
Answer	Yes
Document Name	
Comment	
City Light requests that the SDT propose some examples on how “qualified change” can be defined by PCs	
Likes 0	
Dislikes 0	
Response	
Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF	
Answer	Yes
Document Name	
Comment	
<i>The NAGF agrees that the Planning Coordinator (PC) is the appropriate entity to define what a qualified change is. However, the NAGF is concerned that there will be large variations of the “qualified change” definition/threshold adopted by the various PCs across the ERO. The NAGF recommends PCs coordinate efforts to define the “qualified change” definition/threshold so as to enable consistency across the ERO to the extent possible.</i>	
Likes 0	
Dislikes 0	
Response	

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer Yes

Document Name

Comment

While the PC would appear to be the most appropriate entity to define “qualified change” the new requirement is incomplete in that it provides no guidance or reference whatever to what should be considered when defining a qualified change. Since this is completely arbitrary and can change from one PC to another. It can be defined as broadly as any change at all or as narrowly as only a complete removal of a facility. Without some specification of what should be considered as a qualified change this revision does not support consistency and cannot be considered necessary for the reliability of the Bulk Electric System.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Dwanique Spiller On Behalf of: Kevin Salsbury, Berkshire Hathaway - NV Energy, 5; - Dwanique Spiller

Answer Yes

Document Name

Comment

What if Planning Coordinators, in different regions define a differing definition of qualified change? How will you ensure consistency of definition of qualified change? Is it OK to have a differing definition of qualified change?

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

The Duke Energy YES response is predicated on the assumption that the PC will have sole discretion in defining “technically substantive change”.

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

While assigning each Planning Coordinator to create its definition of “qualified change” does match the status quo, there may be value in publishing application guidelines or another type of NERC guidance documenting best practices in defining a “qualified change” and/or encouraging collaboration and standardization between PCs. Minimizing unnecessary differences in definitions and to promoting clear identification of any differences deemed necessary would help to avoid potential confusion in the industry, especially for facility owners with a presence in more than one PC footprint.

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer Yes

Document Name

Comment

Entergy agrees with the North American Generator Forum (NAGF) comment as follows:

“The NAGF agrees that the Planning Coordinator (PC) is the appropriate entity to define what a qualified change is. However, the NAGF is concerned that there will be large variations of the “qualified change” definition/threshold adopted by the various PCs across the ERO. The NAGF recommends PCs coordinate efforts to define the “qualified change” definition/threshold so as to enable consistency across the ERO to the extent possible.”

Entergy also recommends that the definition of “qualified change” should be agreed upon through a stakeholder review process and align with the end user facilities.

Likes 0

Dislikes 0

Response

Bryan Koyle - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name

Comment

Southern Indiana Gas & Electric Company (SIGE) agrees that the PC is the appropriate entity to define what a qualified change is but proposes to include the PC's coordination with its Transmission Planner(s) in defining what a qualified change is. See SIGE's comment for Question #6 for suggested changes.

Likes 0

Dislikes 0

Response**Leslie Hamby - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

Answer

Yes

Document Name

Comment

CenterPoint Energy Houston Electric, LLC (CEHE) agrees that the PC is the appropriate entity to define what a qualified change is but proposes to include the PC's coordination with its Transmission Planner(s) in defining what a qualified change is. See CEHE's comment for Question #6 for suggested changes.

Likes 0

Dislikes 0

Response**Daniela Atanasovski - APS - Arizona Public Service Co. - 1**

Answer

Yes

Document Name

Comment

AZPS agrees that the Planning Coordinator is the correct entity to define what a qualified change is. AZPS further proposes that Planning Coordinators should be required to provide their definition of "qualified changes" to all Transmission Planners and Transmission Owners within their Planning Coordinator area because both entities are required to study the reliability impacts per R1 . In addition, if there are future modifications to their definition of "qualified changes" the Planning Coordinator should provide the updated version to to all Transmission Planners and Transmission Owners within their Planning Coordinator area prior to the effective date of the change. AZPS also proposes that the Transmission Planner and Transmission Owner should post the Planning Coordinators' definition of "qualified changes" as they are likely to be the initial point of contact for the interconnection customer.

Likes 0

Dislikes 0

Response

Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer Yes

Document Name

Comment

MEC supports the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Robert Hirschak - Cleco Corporation - 6

Answer Yes

Document Name

Comment

The PC is the correct entity, but different PCs may have different ideas for what is a "qualified change." This could lead to various interpretations across the BES.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

DTEE agrees that the Planning Coordinator (PC) is the appropriate entity to define a "qualified change." Consistent with the NAGF recommendations, DTEE requests a consistent "qualified change" definition be developed.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5**Answer** Yes**Document Name****Comment**

AEP has no objections to the PC being tasked with defining what a qualified change is, however please see our concerns regarding a) the Transmission Planner being given opportunity to help shape a definition as provided above in Response #1 and b) the importance of pursuing a phased implementation plan as provided below in Response #5.

Likes 0

Dislikes 0

Response**Jennifer Malon - Jennifer Malon On Behalf of: Derek Silbaugh, Black Hills Corporation, 3, 5, 1, 6; Don Stahl, Black Hills Corporation, 3, 5, 1, 6; Seth Nelson, Black Hills Corporation, 3, 5, 1, 6; - Jennifer Malon****Answer** Yes**Document Name****Comment**

Yes, the PC is the appropriate entity. A guideline providing additional specification and examples would be value-add.

Likes 0

Dislikes 0

Response**Larry Heckert - Alliant Energy Corporation Services, Inc. - 4****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

Response**Donna Wood - Tri-State G and T Association, Inc. - 1**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Teresa Krabe - Lower Colorado River Authority - 1,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mo Derbas - Sempra - San Diego Gas and Electric - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP RTO	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Dana Showalter - Electric Reliability Council of Texas, Inc. - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tammy Porter - Oncor Electric Delivery - 1 - Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Quebec TransEnergie - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Tom Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Council (IRC) Standards Review Committee (SRC)

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Paul Mehlhaff - Sunflower Electric Power Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
John Pearson - ISO New England, Inc. - 2	
Answer	Yes
Document Name	2020-05_Mod_to_FAC-001_and_FAC-002_Unofficial_Comment_Form_12072021_FINAL.docx
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

Jamie Monette - Allele - Minnesota Power, Inc. - 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

Tricia Bynum - FirstEnergy - FirstEnergy Corporation - 6, Group Name FE Voter

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bradley Collard - Pedernales Electric Cooperative, Inc. - 1

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	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Nazra Gladu - Manitoba Hydro - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

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	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

3. The SDT proposes the new requirement R6 in FAC-002-4 and associated VRF and VSL. Do you agree that the associate VRF and VSL levels are appropriate? If you do not agree, or if you agree but have suggestions for improvement please provide your recommendation and, if appropriate, technical or procedural justification.

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer No

Document Name

Comment

If you are asking the Planning Coordinators to make the definitions, then the PCs should determine how severe the violation should be. The Drafting team is asking for us to approve a standard with a definition that is yet to be determined. This puts the entities in a high risk situation with no recourse to debate the definition or the severity of the penalty.

Likes 0

Dislikes 0

Response

Jennifer Malon - Jennifer Malon On Behalf of: Derek Silbaugh, Black Hills Corporation, 3, 5, 1, 6; Don Stahl, Black Hills Corporation, 3, 5, 1, 6; Seth Nelson, Black Hills Corporation, 3, 5, 1, 6; - Jennifer Malon

Answer No

Document Name

Comment

BHC does not agree with the singular Severe VSL rating. The ratings should be provided in a tiered structure, similar to the suggestion below.

- Severe – PC did not have a definition and did no not maintain a publicly available definition...
- High – PC had a definition, but did not make the public
- Moderate – PC had a definition, but was not public for an extended duration
- Lower – PC had a definition, but not public for a small duration

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

DTEE disagrees that a Lower Violation Risk Factor is aligned with a Severe Violation Severity Level.

Likes 0

Dislikes 0

Response

Robert Hirschak - Cleco Corporation - 6

Answer

No

Document Name

Comment

Medium risk should be low since the study is based on human judgement which for reliability planning is very conservative.

Likes 0

Dislikes 0

Response

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

Answer

No

Document Name

Comment

The Risk Factor in the Requirement (Page5) should be "Low", it does not correlate with the VRF in Column R6 in the Violation Severity Level table on Page 11. The verbiage should be "Low" rather than "Lower" for both locations.

Likes 0

Dislikes 0

Response

Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer

No

Document Name

Comment

MEC supports the MRO NSRF comments.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

As discussed in the response to Question 2, Reclamation recommends that Requirement R6 is not necessary when the definition is properly contained in the NERC Glossary of Terms. If R6 is left in the standard, Reclamation recommends language to correct the grammatical mishaps in the VSLs similar to the proposed language stated in the response to Question 1.

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer No

Document Name

Comment

Entergy agrees with the NAGF comment as follows:

“The NAGF believes that the proposed VRF = Lower is not aligned with a VSL that is proposed as being severe.”

Entergy also recommends that the Table and Requirement 6 should be consistent.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Duke Energy agrees with the VRF classification. However, the stated Violation Severity Level should be delineated with multiple classifications. For example, additional classifications should be considered for Developing/Establishing, Posting/Publishing, etc.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Dwanique Spiller On Behalf of: Kevin Salsbury, Berkshire Hathaway - NV Energy, 5; - Dwanique Spiller

Answer

No

Document Name

Comment

R6 can be categorized under 'High VSL'.

Likes 0

Dislikes 0

Response

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

Answer

No

Document Name

Comment

A VRF of "Medium" is listed in the text of the requirement while a VSL of Lower is listed in the VSL Tables. Because there is no minimum or stated guidance for what constitutes a qualified change and that there are multiple ways an interested entity could communicate and coordinate with its PC the requirement to publicly post is administrative in nature and represents only one way information could be communicated. A VRF of "Lower" should be the maximum considered. Similarly, while a non-compliance with the requirement would be binary since this is a simple posting requirement the maximum severity level should be Lower VSL

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

No

Document Name

Comment

The NAGF believes that the proposed VRF = Lower is not aligned with a VSL that is proposed as being severe per the table on page 11 of FAC-002-4. Note that there is a disconnect between the VRF = Medium defined under R6 on page 5 compared to the table on page 11.

Likes 0

Dislikes 0

Response**Daniel Gacek - Exelon - 1****Answer**

No

Document Name**Comment**

Comments submitted on behalf of Exelon for Segments 1, 3, 5, 6

Exelon concurs with the NAGF comment to review and align the VRF and VSL

Likes 0

Dislikes 0

Response**Daniela Atanasovski - APS - Arizona Public Service Co. - 1****Answer**

Yes

Document Name**Comment**

None

Likes 0

Dislikes 0

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

Yes

Document Name

Comment

The VRF identified in the VSL table on Page 11 of 13 indicates this VRF is Lower. This is in conflict with the identified VRF stated in the actual Requirement on Page 5 of 13. Additionally, the NSRF supports a Lower VRF.

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer

Yes

Document Name

Comment

A NERC glossary term for “qualified change” is preferred and would make this more of a moot point but, in the absence of that, consider allowing for a VSL accounting for the maintaining of the definition but failure to make it public.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster 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; - Alan Kloster

Answer

Yes

Document Name

Comment

Evergy supports and incorporates by reference Edison Electric Institute’s (EEL) response to Question 3.

Likes 0

Dislikes 0

Response

Amy Casuscelli - Amy Casuscelli On Behalf of: Dean Schiro, Xcel Energy, Inc., 1, 5, 3; - Amy Casuscelli

Answer

Yes

Document Name

Comment

Xcel Energy supports the comments of EEI.

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Tom Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Council (IRC) Standards Review Committee (SRC)

Answer

Yes

Document Name

Comment

The IRC SRC is supportive of the Lower VRF. We note that there appears to be a discrepancy between the VRF noted in the text of the requirement (i.e. Medium) and the VRF in the table (i.e. Lower). We ask the SDT to ensure these are aligned to a "Lower" VRF. The revised language would read:

R6. Each Planning Coordinator shall maintain a publicly available definition of qualified change for the purposes of facility interconnection. [Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

EEI agrees with the SDT that the VRF and VSL developed for FAC-002-4, R6.

Likes 0

Dislikes 0

Response

Dana Showalter - Electric Reliability Council of Texas, Inc. - 2

Answer	Yes
Document Name	
Comment	
ERCOT supports the comments of the IRS SRC.	
Likes 0	
Dislikes 0	
Response	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports the comments provided by EEI.	
Likes 0	
Dislikes 0	
Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	Yes
Document Name	
Comment	
PG&E agrees with the SDT on the VRF and VSL developed for FAC-002-4, R6.	
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

No additional suggestions for improvement.

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Yes

Document Name

Comment

Yes, we agree with the proposed VRF and VSL levels. However, please ensure the VRF in R6 is corrected to reflect Lower, instead of Medium.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Alliant Energy supports comments submitted by the MRO NSRF.

Likes 0

Dislikes 0

Response

Diane Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

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

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

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Nazra Gladu - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Leslie Hamby - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Bradley Collard - Pedernales Electric Cooperative, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tricia Bynum - FirstEnergy - FirstEnergy Corporation - 6, Group Name FE Voter

Answer

Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Bryan Koyle - Southern Indiana Gas and Electric Co. - 3,5,6 - RF	
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	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response

Lindsey Mannion - ReliabilityFirst - 10

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

LaTroy Brumfield - American Transmission Company, LLC - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michael Jang - Seattle City Light - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Paul Mehlhaff - Sunflower Electric Power Corporation - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response**Tammy Porter - Oncor Electric Delivery - 1 - Texas RE****Answer**

Yes

Document Name**Comment**

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP RTO

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

Mo Derbas - Sempra - San Diego Gas and Electric - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 1,5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Quintin Lee - Eversource Energy - 1, Group Name Eversource Group

Answer

Document Name

Comment

No comment since this is a PC responsibility.

Likes 0

Dislikes 0

Response

4. The SDT proposes that the modifications in FAC-001-4 and FAC-002-4 meet the SAR in a cost effective manner. Do you agree? If you do not agree, or if you agree but have suggestions for improvement to enable more cost effective approaches, please provide your recommendation and, if appropriate, technical or procedural justification.

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer No

Document Name

Comment

PG&E at this time cannot determine if the modifications are cost effective.

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP RTO

Answer No

Document Name

Comment

SPP believes reliability requirements should not merely be cost effective but are commensurate with the risks they seek to mitigate. There is not a simple approach to assess cost impacts of standards. Therefore, we suggest that NERC develop a pilot program to introduce parameters that would help industry gauge the cost effectiveness of new or revised standards. From our perspective, the parameters for cost are best developed by the standards drafting team. As an example, standards that are more administrative in nature such as in this Project, the SDT could provide a range based on implementation of the FAC-001 and FAC-002 from their respective team members' companies. For standard projects that are more involved and may require equipment reconfigurations/purchases a broader approach to gathering cost data from the industry might be necessary.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer No

Document Name

Comment

Comments submitted on behalf of Exelon for Segments 1, 3, 5, 6

The proposed changes to the standards do not define “qualified change” which creates concern that routine maintenance activities such as cleaning condenser tubes or calibrating instrumentation that may cause nominal changes to generator output power could trigger the need for expensive studies.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

No

Document Name

Comment

GO/GOPs will need more information to adequately assess the cost effectiveness of the proposed approach.

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer

No

Document Name

Comment

Entergy agrees with the NAGF comment as follows:

“GO/GOPs will need more information to adequately assess the cost effectiveness of the proposed approach.”

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer

No

Document Name

Comment

A NERC glossary term for “qualified change” is preferred and would make this more of a moot point but, the proposed action would have little cost benefit to industry. If the SDT were to consider condensing the requirements included in both the FAC-001-4 and FAC-002-3 Reliability Standards into one streamlined FAC Facility Interconnection Studies and Requirements Standard, industry may see some benefit in accomplishing and demonstrating compliance.

Likes 0

Dislikes 0

Response

Tricia Bynum - FirstEnergy - FirstEnergy Corporation - 6, Group Name FE Voter

Answer

No

Document Name

Comment

We ask for clarification of terms to be used and how PCs may interpret these terms before cost effectiveness can be determined.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Reclamation observes that the primary modifications to FAC-001 and FAC-002 are grammatical and do not materially affect the compliance obligations or activities of applicable entities. Project 2020-05 could have been accomplished with errata rather than the expensive and resource-intensive standards development process.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

A position on cost effectiveness of the proposed approach cannot be conducted until further information is provided.

Likes 0

Dislikes 0

Response**Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6**

Answer

No

Document Name

Comment

I do not see a cost/benefit analysis of this standard, how was cost effectiveness established? What metrics were used? How much did the problem cost, and how much will the solution cost?

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

No additional suggestions for improvement.

Likes 0

Dislikes 0

Response**Elizabeth Davis - Elizabeth Davis On Behalf of: Tom Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Council (IRC) Standards Review Committee (SRC)**

Answer

Yes

Document Name

Comment

Change appears cost effective in relation to implementation of the processes necessary to identify the potential impacts to the system, and our response is not in relation to potential future upgrades that may result from those reviews.

Likes 0

Dislikes 0

Response

Amy Casuscelli - Amy Casuscelli On Behalf of: Dean Schiro, Xcel Energy, Inc., 1, 5, 3; - Amy Casuscelli

Answer Yes

Document Name

Comment

Xcel Energy supports the comments of EEI.

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer

Yes

Document Name

Comment

MEC supports the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer

Yes

Document Name

Comment

The proposed modifications appear to be cost effective, as they would continue to utilize the existing stakeholder planning and processes that are valued and have proven beneficial.

Likes 0

Dislikes 0

Response

Jennifer Malon - Jennifer Malon On Behalf of: Derek Silbaugh, Black Hills Corporation, 3, 5, 1, 6; Don Stahl, Black Hills Corporation, 3, 5, 1, 6; Seth Nelson, Black Hills Corporation, 3, 5, 1, 6; - Jennifer Malon

Answer

Yes

Document Name

Comment

BHC believes it would be cost effective with a guideline providing additional specification and examples.

Likes 0

Dislikes 0

Response

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 1,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mo Derbas - Sempra - San Diego Gas and Electric - 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

Dana Showalter - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tammy Porter - Oncor Electric Delivery - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Paul Mehlhaff - Sunflower Electric Power Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster 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; - Alan Kloster

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Michael Jang - Seattle City Light - 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

Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring

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

Dwanique Spiller - Dwanique Spiller On Behalf of: Kevin Salsbury, Berkshire Hathaway - NV Energy, 5; - Dwanique Spiller

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

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

Bryan Koyle - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Bradley Collard - Pedernales Electric Cooperative, Inc. - 1

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Leslie Hamby - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer	Yes
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Document Name	
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Comment	
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Likes	0
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Dislikes	0
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Response	
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Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer	Yes
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Document Name	
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Comment	
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Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

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	
Robert Hirschak - Cleco Corporation - 6	
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

Carl Pineault - Hydro-Qu?bec Production - 5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Diane Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

David Jendras - Ameren - Ameren Services - 3

Answer

Document Name

Comment

No comment.

Likes 0

Dislikes 0

Response

Quintin Lee - Eversource Energy - 1, Group Name Eversource Group

Answer	
Document Name	
Comment	
No comment on cost	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	

5. The SDT is proposing a 12-month implementation plan. If you think an alternate timeframe is needed, please propose an alternate implementation plan and time period, and provide a detailed explanation of actions planned to meet the implementation deadline.

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer No

Document Name

Comment

A 12 month implementation is not sufficient, since we don't know how long it will take a PC to negotiate a definition for qualified change, when that will hit our planning process, and how it may impact our facilities.

Likes 1 Pedernales Electric Cooperative, Inc., 1, Collard Bradley

Dislikes 0

Response

Thomas Foltz - AEP - 5

Answer No

Document Name

Comment

While the proposed implementation period for the revised FAC-002 may be sufficient, 12 months would *not* be sufficient for what has been proposed for the revised FAC-001. The PC's will first require time of their own to develop their definitions through their list of stakeholders. Following that, the Transmission Planners would then need ample opportunity to update their appropriate procedures based on those new definitions. As a result, we believe a phased implementation approach for FAC-001 would be appropriate, one that allows the PC's 12 months to both develop their definitions and potentially collaborate with their stakeholders on them, and a subsequent (i.e. not "concurrent") 12 months for the Transmission Planners to update their procedures as needed.

Likes 0

Dislikes 0

Response

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

Answer No

Document Name

Comment

Consistent with the NAGF's comments, DTEE is concerned with a 12 month implementation plan. It may not provide enough time or clarity to ensure that entities within a Planning Coordinator area will have enough time to respond to the Planning Coordinator's definition of a "qualified change." We recommend a longer implementation plan for Generator Owners, perhaps eighteen (18) to twenty-four (24) months.

Likes 0

Dislikes 0

Response

Robert Hirschak - Cleco Corporation - 6

Answer

No

Document Name

Comment

Transmission and generation projects are usually planned two to five years ahead. Twelve months may cause a gap in projects that have completed the studies and approval processes and may need to be re-evaluated with the new PC criteria. Two years would give enough time to re-evaluate and re-study projects.

Likes 0

Dislikes 0

Response

Matthew Jaramilla - Salt River Project - NA - Not Applicable - WECC

Answer

No

Document Name

Comment

In the Western Interconnection the Large Generator Interconnection Procedures (LGIP) is sometimes used for Joint Ownership projects. Getting these amended takes longer than 12 months.

Likes 0

Dislikes 0

Response

Bradley Collard - Pedernales Electric Cooperative, Inc. - 1

Answer

No

Document Name

Comment

PEC recommends a two step implementation plan:

- Step one would define the timeline for adoption of the definition of the qualified change by the Planning Coordinator.
- Step two would define the timeline for adoption of the study requirements for “qualified changes” when the change did not require study before the adoption of the new definition of a “qualified change” (suggest a minimum of two years).

PEC believes the initial requirement of the PC to identify what constitutes a “qualified change,” depending when that occurs, should have a delayed implementation of FAC-001-4 R1 and R2 that will allow some time to change any of the TOs’ or applicable GOs’ terms taking into account what may constitute a “qualified change.”

PEC desires a minimum of a six month delay between FAC-002-4 R6 and FAC-001-4 R3 for the same reasons mentioned above.

Likes 0

Dislikes 0

Response

Tricia Bynum - FirstEnergy - FirstEnergy Corporation - 6, Group Name FE Voter

Answer

No

Document Name

Comment

We suggest the Drafting Team add an additional 12-month timeframe so that affected entities may implement changes stemming from work PCs will undertake to comply with the standard (i.e., additional time is needed to provide affected responsible entities to develop processes and procedures internally).

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer

No

Document Name

Comment

A 24 month implementation period would better ensure a sufficient transitional period.

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer No

Document Name

Comment

Entergy agrees with the NAGF comment as follows:

“The NAGF is concerned that a 12 month implementation plan will not provide enough time or clarity to ensure that entities within a Planning Coordinator area will have enough time to respond to the Planning Coordinator’s definition of a “qualified change.” For instance, if a Planning Coordinator were to develop and publish their “qualified change” 11 months within the implementation plan, this would only give entities within their footprint one month to develop a compliance plan. The NAGF supports an implementation plan that would give Planning Coordinators twelve months to develop their definition of a “qualified change” as required within FAC-002-4 R6. Compliance with FAC-001-4 R3 and R4 will take time based upon the Planning Coordinator’s definition of a “qualified change.” As such, twenty-four calendar months to comply with FAC-001-4 R3 and 4 would be prudent for Generator Owners. Additionally, a current challenge is that “publicly available” information can be challenging to locate. Planning Coordinators need to directly communicate with their Generator Owners on where the information required within FAC-002-4 R6 is located.”

Entergy agrees with a Phased Implementation approach whereas the 1st phase would allow the PC to define and set the threshold of a qualified change and the 2nd phase would begin after qualified change had been defined and approved.

Another option would be for projects that start after standard implementation date but before definition of qualified change would be excluded from qualified change definition.

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer No

Document Name

Comment

The NAGF is concerned that a 12 month implementation plan will not provide enough time or clarity to ensure that entities within a Planning Coordinator area will have enough time to respond to the Planning Coordinator’s definition of a “qualified change.” For instance, if a Planning Coordinator were to develop and publish their “qualified change” 11 months within the implementation plan, this would only give entities within their footprint one month to develop a compliance plan. The NAGF supports an implementation plan that would give Planning Coordinators twelve months to develop their definition of a “qualified change” as required within FAC-002-4 R6. Compliance with FAC-001-4 R3 and R4 will take additional time based upon the Planning Coordinator’s definition of a “qualified change.” As such, twenty-four calendar months to comply with FAC-001-4 R3 and R4 would be prudent.

Additionally, a concern is that “publicly available” information can be challenging to locate. Planning Coordinators need to directly communicate with their Generator Owners on where the information required within FAC-002-4 R6 is located.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster 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; - Alan Kloster

Answer

No

Document Name

Comment

Evergy supports and incorporates by reference Edison Electric Institute’s (EEI) response to Question 5.

Likes 0

Dislikes 0

Response

Amy Casuscelli - Amy Casuscelli On Behalf of: Dean Schiro, Xcel Energy, Inc., 1, 5, 3; - Amy Casuscelli

Answer

No

Document Name

Comment

Xcel Energy supports the comments of EEI.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

No

Document Name

Comment

Comments submitted on behalf of Exelon for Segments 1, 3, 5, 6

Exelon does not support a 12-month implementation plan and concurs with the comments and suggestions submitted by the NAGF and EEI.

Likes 0

Dislikes 0

Response

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

Answer

No

Document Name

Comment

Although EEI agrees a 12-month implementation plan would be sufficient for the PC to implement the changes proposed under FAC-002, an additional 12-months will be necessary for other affected entities to implement changes stemming from work PCs will undertake to comply with the standard (i.e., additional time is needed to provide affected responsible entities to develop processes and procedures internally).

Likes 0

Dislikes 0

Response

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Answer

No

Document Name

Comment

Additional time is necessary to not only develop the qualified change definition but to then educate the stakeholders. We suggest an implementation period of 24 months. The proposed revision to FAC-002-3 would have the Planning Coordinators maintain a definition of "qualified change" for the purposes of Facility interconnection. There are currently 73 registered PCs reflected in the NERC Compliance Registry. We suggest that PCs within each of the four Interconnections be provided an opportunity to develop a definition at the Interconnection level, and if that cannot be achieved, allow PCs within each of the NERC Regions to consider a common definition at the Region level. Otherwise, entities seeking to interconnect generation, transmission or end-user Facilities could have multiple definitions to keep track of. Also to be considered, the PCs will need to coordinate with their associated Transmission Owners and possibly Transmission Planners in developing this definition. The Transmission Owners are required to maintain Facility interconnection requirements under FAC-001, R1. Incorporation of their PC's definition of a qualified change into those Facility interconnection requirements would likely be needed, so those seeking to interconnect a generation, transmission or end-user Facility to the TO's facilities would have a better understanding of the associated study expectations. Cooperation and communication among the TO, PC and TP seems to be an assumed given between FAC-001 and FAC-002.

Likes 0

Dislikes 0

Response

Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments

Answer No

Document Name

Comment

PG&E agrees with the Edison Electric Institute (EEI) input that a 12-month implementation plan for the PC is sufficient, but an additional 12-months may be necessary for TP entities affected by the change to implement those changes.

Likes 0

Dislikes 0

Response

Jennifer Malon - Jennifer Malon On Behalf of: Derek Silbaugh, Black Hills Corporation, 3, 5, 1, 6; Don Stahl, Black Hills Corporation, 3, 5, 1, 6; Seth Nelson, Black Hills Corporation, 3, 5, 1, 6; - Jennifer Malon

Answer Yes

Document Name

Comment

BHC agrees with the 12-month implementation plan, but would recommend providing a guideline with additional specification and examples.

Likes 0

Dislikes 0

Response

Carl Pineault - Hydro-Quebec Production - 5

Answer Yes

Document Name

Comment

12 months is OK

Likes 0

Dislikes 0

Response

Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer Yes

Document Name

Comment

MEC supports the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer Yes

Document Name

Comment

None

Likes 0

Dislikes 0

Response

Leslie Hamby - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer Yes

Document Name

Comment

CEHE agrees with a 12-month implementation timeframe.

Likes 0

Dislikes 0

Response

Bryan Koyle - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer Yes

Document Name	
Comment	
SIGE agrees with a 12-month implementation timeframe.	
Likes 0	
Dislikes 0	
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
None.	
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	
Southern Company supports EEI's comments to Project 2020-05 Modifications to FAC-001 and FAC-002 for the comment period closing January 31, 2022.	
A 12-month implementation plan would be sufficient for the PC to implement the changes proposed under FAC-002 however, an additional 12-months may be necessary for other affected entities to implement changes stemming from work PCs will undertake to comply with the standard (i.e., additional time is needed to provide affected responsible entities to develop processes and procedures internally).	
Likes 0	
Dislikes 0	
Response	
Steven Rueckert - Western Electricity Coordinating Council - 10, Group Name WECC Entity Monitoring	

Answer	Yes
Document Name	
Comment	
12 months should be adequate.	
Likes 0	
Dislikes 0	
Response	
Daniel Mason - Portland General Electric Co. - 6, Group Name PGE FCD	
Answer	Yes
Document Name	
Comment	
There should be a set timeline for defining the term "qualified change" so that entities have a predictable timeline to implement the applicable changes.	
Likes 0	
Dislikes 0	
Response	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Ameren agrees with and supports the comments provided by EEI.	
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

No additional suggestions for improvement.

Likes 0

Dislikes 0

Response

Diane Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

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

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

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Glen Farmer - Avista - Avista Corporation - 5

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nazra Gladu - Manitoba Hydro - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response**Leonard Kula - Independent Electricity System Operator - 2****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**Rachel Coyne - Texas Reliability Entity, Inc. - 10****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

Lindsey Mannion - ReliabilityFirst - 10

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dwanique Spiller - Dwanique Spiller On Behalf of: Kevin Salsbury, Berkshire Hathaway - NV Energy, 5; - Dwanique Spiller

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

Michael Jang - Seattle City Light - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Paul Mehlhaff - Sunflower Electric Power Corporation - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Tom Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Council (IRC) Standards Review Committee (SRC)

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Tammy Porter - Oncor Electric Delivery - 1 - Texas RE

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Dana Showalter - Electric Reliability Council of Texas, Inc. - 2

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - MRO, Group Name SPP RTO

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Mo Derbas - Sempra - San Diego Gas and Electric - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Teresa Krabe - Lower Colorado River Authority - 1,5

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Donna Wood - Tri-State G and T Association, Inc. - 1

Answer

Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

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

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

Quintin Lee - Eversource Energy - 1, Group Name Eversource Group

Answer

Document Name

Comment

This cannot be answered until the PC defines 'qualified change.'

Likes 0

Dislikes 0

Response

6. Provide any additional comments for the standard drafting team to consider, including the provided technical rationale document, if desired.

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

Answer

Document Name

Comment

No additional comments.

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

Document Name

Comment

While ACES agrees with all of the proposed changes, the adequacy of the “qualified change” definition the Planning Coordinator (PC) develops is not addressed. Proposed changes to FAC-001 and FAC-002 are meant to address confusion and potential reliability issues within the industry stemming from potential differences to what is considered “materially modifying”. While the proposed changes should eliminate potential confusion amongst coordinating entities, it does not ensure the definition is adequate.

Likes 0

Dislikes 0

Response

Jose Avendano Mora - Edison International - Southern California Edison Company - 1,3,5,6

Answer

Document Name

Comment

See comments submitted by the Edison Electric Institute.

Likes 0

Dislikes 0

Response	
Michael Johnson - Michael Johnson On Behalf of: Frank Lee, Pacific Gas and Electric Company, 3, 1, 5; Marco Rios, Pacific Gas and Electric Company, 3, 1, 5; Sandra Ellis, Pacific Gas and Electric Company, 3, 1, 5; - Michael Johnson, Group Name PG&E All Segments	
Answer	
Document Name	
Comment	
<p>PG&E supports the comments provided by the Edison Electric Institute (EEI) related to the suggested modification to FAC-001-4, Requirement R3, Part 3.1 on the removal of the reference to FAC-002-4, Requirement R6.</p> <p>PG&E is voting "negative" on approval of the modifications to allow the SDT to address the comments provided in Q2 (PC/TOP coordination) and Q5 (additional time for the TP).</p>	
Likes 0	
Dislikes 0	
Response	
David Jendras - Ameren - Ameren Services - 3	
Answer	
Document Name	
Comment	
Ameren agrees with and supports the comments provided by EEI.	
Likes 0	
Dislikes 0	
Response	
Dana Showalter - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	
ERCOT supports the comments of the IRS SRC.	
Likes 0	

Dislikes 0

Response

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

Answer

Document Name

Comment

EEl offers the following additional input:

FAC-001-4

Requirement R3, subpart 3.1

EEl suggest removing the reference to FAC-002 because aligning requirements within one Reliability Standard to another Reliability Standard can create problems when the standard is changed in the future. (see suggested input below)

3.1 Procedures for coordinated studies and identifying the impacts on affected systems for new interconnections or existing interconnections seeking to make a qualified change as defined by the Planning Coordinator. **(Delete: under Reliability Standard FAC-002-4 Requirement R6)**

Likes 0

Dislikes 0

Response

Nicolas Turcotte - Hydro-Qu?bec TransEnergie - 1

Answer

Document Name

Comment

It would seem clearer and more precise if in FAC-001, under R3.1 and R3.2, instead of the wordings "... new interconnections..." and "... existing interconnections seeking...", we had "... new interconnections of Facilities..." and "... existing interconnected Facilities seeking..."(or"... existing interconnections of Facilities seeking... "). It seems to me that this would better and advantageously link the text to the notion of facilities rather than to their connection, especially in the case where we are talking about modifications (qualified change). This could also be applied in FAC-002, under R1.1.1, and under R4 (R1, R2 and R3 do include the term "Facilities").

M6 of FAC-002-4 should appear as a redline in the Redline version of the standard in question.

Likes 0

Dislikes 0

Response

Elizabeth Davis - Elizabeth Davis On Behalf of: Tom Foster, PJM Interconnection, L.L.C., 2; - Elizabeth Davis, Group Name ISO/RTO Council (IRC) Standards Review Committee (SRC)

Answer

Document Name

Comment

The IRC SRC supports the substance of these standards, as drafted. However, if the SDT proposes a second draft of these standards, the IRC SRC proposes the following editorial changes: Change “seeking to make a qualified change as defined by the Planning Coordinator under Requirement R6” to “for which a qualified change, as defined by the PC under Requirement R6, is proposed” and change “seeking to make a qualified change” to “for which a qualified change is proposed” in all instances where these or similar phrases are used.

Likes 0

Dislikes 0

Response

Paul Mehlhaff - Sunflower Electric Power Corporation - 1

Answer

Document Name

Comment

Sunflower supports the following ACES comment.

While ACES agrees with all of the proposed changes, the adequacy of the “qualified change” definition the Planning Coordinator (PC) develops is not addressed. Proposed changes to FAC-001 and FAC-002 are meant to address confusion and potential reliability issues within the industry stemming from potential differences to what is considered “materially modifying”. While the proposed changes should eliminate potential confusion amongst coordinating entities, it does not ensure the definition is adequate.

Likes 0

Dislikes 0

Response

Daniel Gacek - Exelon - 1

Answer

Document Name

Comment

Comments submitted on behalf of Exelon for Segments 1, 3, 5, 6

Exelon concurs with the additional comments submitted by the EEI.

Likes 0

Dislikes 0

Response

Alan Kloster - Alan Kloster 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; - Alan Kloster

Answer

Document Name

Comment

Evergy supports and incorporates by reference Edison Electric Institute's (EEI) response to Question 6.

Likes 0

Dislikes 0

Response

Michael Jang - Seattle City Light - 1

Answer

Document Name

Comment

SCL suggests the team should consider adding the definition of qualified change to the items to include in Facility interconnection requirements under R3 of FAC-001

Likes 0

Dislikes 0

Response

Wayne Sipperly - North American Generator Forum - 5 - MRO,WECC,Texas RE,NPCC,SERC,RF

Answer

Document Name

Comment

The NAGF has no additional comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

The language in FAC-001-4 R3 was modified which changed the meaning. In previous versions of the standard, the language stated “Procedures for coordinated studies of new or materially modified existing interconnections and their impacts on the affected system(s)” whereas the new version 4 moved the wording regarding “impacts”. The new standard now states in 3.1 that the TO shall address “Procedures for coordinated studies and identifying the impacts for affected systems...”. The change to the requirement makes it sound as though the TO should itself, identify impacts instead of simply coordinating impacts. Southern Company recommends the SDT discuss if this was the intent.

Additional comments for consideration:

NERC should consider whether the reliability objectives for FAC-001 and FAC-002 are met through existing FERC rules and/or existing enforceable Reliability Standards, especially with regard to Generator Interconnection Facilities. Several comments to this effect were submitted by registered entities during the Standards Efficiency Review (Phase I) effort. Perhaps a review of the applicability of these Standards to Generator Owners or to Generator Interconnection Facilities could be included in the next periodic review of these Standards.

Likes 0

Dislikes 0

Response

Dwanique Spiller - Dwanique Spiller On Behalf of: Kevin Salsbury, Berkshire Hathaway - NV Energy, 5; - Dwanique Spiller

Answer

Document Name

Comment

N/A

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

None.

Likes 0

Dislikes 0

Response

Lindsey Mannion - ReliabilityFirst - 10

Answer

Document Name

Comment

Throughout the proposed changes to FAC-001 and FAC-002, the grammatical use of “interconnection” is confusing. “Interconnections” do not seek to make changes; owners of interconnected Facilities seek make changes.

In FAC-001 R3, the proposed text reads “existing interconnections seeking to make a qualified change” but language such as “owners of existing interconnected Facilities seeking to make a qualified change” is more accurate. An interconnection can be modified or changed, but a Facility owner would seek to make a modification or change.

Similarly, in FAC-002 R2, a Facility owner is either seeking to interconnect new generation Facilities or seeking to make a qualified change, but the proposed text of R2 reads that the “existing interconnection of generation Facilities [is] seeking to make a qualified change.”

Likes 0

Dislikes 0

Response

Julie Hall - Entergy - 6, Group Name Entergy

Answer

Document Name

Comment

NA

Likes 0

Dislikes 0

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer

Document Name

Comment

Texas RE has the following additional comments on FAC-001:

- Texas RE recommends not referencing the FAC-002-4 standard directly in Requirements R3.1 and R4.3. If changes are made to one or the other standard at a later date, both would need to be part of the project. The SDT could leave the language as “seeking to make a qualified change as defined by the Planning Coordinator.”
- In Requirements R3.3 and R4.3, Texas RE recommends removing the term “metered” since the definition of Balancing Authority Area includes metered boundaries.
- Texas RE recommends adding “when” in front of “seeking to make a qualified change” in Requirements R3.1, R3.2, and R3.3 since the TO would need the procedures when seeking a qualified change.

Texas RE has the following comments on FAC-002:

- In Requirement R3, the phrase “electricity end-user Facilities” appears twice. Texas RE suggest removing the second one.
- Texas RE recommend including “end-user Facilities” in Requirement R4 to be consistent with Requirement R3.

Texas RE has the following additional comments:

- The VSL for Requirement R4 needs a space after between “R6to”

Likes 0

Dislikes 0

Response

Stephen Stafford - Stephen Stafford On Behalf of: Greg Davis, Georgia Transmission Corporation, 1; - Stephen Stafford

Answer

Document Name

Comment

- It appears the primary impetus for the suggested changes to FAC-001 & FAC-002 is (inverter-based) generation related. Consideration should be given to providing distinguishment between generation interconnections and interconnection of transmission and electricity end-user Facilities. It should also be considered if the inclusion of transmission and electricity end-user Facilities in FAC-001 and FAC-002 has become redundant with currently effective TPL and PRC requirements.
- Overall, bringing clarity to “qualified changes” is appropriate, and distinguishing it from FERC’s “materially modified” term is prudent. The currentl proposal for FAC-001 and FAC-002 would not effectively accomplish that however. Varying definitions of “qualified change” between

PCs and the lack of input into this definition from TPs would almost certainly lead to industry confusion on these types of modifications. A NERC glossary term (preferably), or an enumeration of specific criteria within the standards would provide for a more consistent definition.

- The wording "...seeking to make a qualified change..." should be preceded by a subject, such as the word "entities". For Example, the proposed FAC-001-4, R3.1 would be more appropriately written in the following manner. This suggestion also applies to parts R3.2 – R3.4 in FAC-001-4 and in the Purpose, R1, R1.1, R2, R3, R4, & R6 in FAC-002-4.
- "Procedures for coordinated studies and identifying the impacts on affected systems for new interconnections, or entities seeking to a make a qualified change to an existing interconnection as defined by the Planning Coordinator under Reliability Standard FAC-002-4 Requirement R6."

Likes 0

Dislikes 0

Response

Bryan Koyle - Southern Indiana Gas and Electric Co. - 3,5,6 - RF

Answer

Document Name

Comment

SIGE commends the efforts of the SDT and believes that the proposal to replace the vague term, "materially modified," with the defined term, "qualified change," should bring clarity to what should be included in the Facility Interconnection Requirements and what should be studied in the Transmission Planning Assessment.

SIGE believes that successful collaboration between the Planning Coordinator and its Transmission Planners will be beneficial in developing what a "qualified change" is. SIGE recommends that the following updates be considered for the proposed FAC-001-4:

R3.1: Update the sub-requirement to include "in conjunction with its Transmission Planner(s)". The updated sub-requirement would read:

(R3.1) "Procedures for coordinated studies and identifying the impacts on affected systems for new interconnections or existing interconnections seeking to make a qualified change as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Reliability Standard FAC-002-4 Requirement R6."

R3.2 and R3.3: Update the sub-requirements to include "as defined by the Planning Coordinator under Reliability Standard FAC-002-4 Requirement R6" and "in conjunction with its Transmission Planner(s)".

The updated sub-requirements would read:

(R3.2) "Procedures for notifying those responsible for the reliability of affected system(s) of new interconnections or existing interconnections seeking to make a qualified change as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Reliability Standard FAC-002-4 Requirement R6."

(R3.3) Procedures for confirming with those responsible for the reliability of affected systems that new Facilities or existing Facilities seeking to make a qualified change as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Reliability Standard FAC-002-4 Requirement R6 are within a Balancing Authority Area's metered boundaries.

These changes will provide consistency and clarity as the term "qualified change" is not defined within the Standard but by the Planning Coordinator per FAC-002-4 R6.

SIGE recommends that the following updates be considered for the proposed FAC-002-4:

R1, R1.1, R2, R3, R4: Update the requirement/sub-requirements to include "in conjunction with its Transmission Planner(s)". The updated requirement/sub-requirements would read:

(R1) Each Transmission Planner and each Planning Coordinator shall study the reliability impact of: (i) interconnecting new generation, transmission, or electricity end-user Facilities and (ii) existing interconnections of generation, transmission, or electricity end-user Facilities seeking to make a qualified change as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Requirement R6. The following shall be studied:...

(R1.1) The reliability impact of the new interconnection, or existing interconnection seeking to make a qualified change as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Requirement R6, on affected system(s).

R2. Each Generator Owner seeking to interconnect new generation Facilities, or existing interconnections of generation Facilities seeking to make a qualified change as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Requirement R6, shall coordinate and cooperate on studies with its Transmission Planner or Planning Coordinator, including but not limited to the provision of data as described in R1, Parts 1.1-1.4.

R3. Each Transmission Owner and each Distribution Provider seeking to interconnect new transmission Facilities or electricity end-user Facilities, or existing interconnections of transmission Facilities seeking to make a qualified change as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Requirement R6, or electricity end-user Facilities, shall coordinate and cooperate on studies with its Transmission Planner or Planning Coordinator, including but not limited to the provision of data as described in R1, Parts 1.1-1.4.

R4. Each Transmission Owner shall coordinate and cooperate with its Transmission Planner or Planning Coordinator on studies regarding requested new or existing interconnections seeking to make a qualified change as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Requirement R6, to its Facilities, including but not limited to the provision of data as described in R1, Parts 1.1-1.4

Likes 0

Dislikes 0

Response

Tricia Bynum - FirstEnergy - FirstEnergy Corporation - 6, Group Name FE Voter

Answer

Document Name

Comment

n/a

Likes 0

Dislikes 0

Response

Leslie Hamby - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE

Answer

Document Name

Comment

CEHE commends the efforts of the SDT and believes that the proposal to replace the vague term, “materially modified,” with the defined term, “qualified change,” should bring clarity to what should be included in the Facility Interconnection Requirements and what should be studied in the Transmission Planning Assessment.

CEHE believes that successful collaboration between the Planning Coordinator and its Transmission Planners will be beneficial in developing what a “qualified change” is. CEHE recommends that the following updates be considered for the proposed FAC-001-4:

R3.1: Update the sub-requirement to include “in conjunction with its Transmission Planner(s)”. The updated sub-requirement would read:

(R3.1) “Procedures for coordinated studies and identifying the impacts on affected systems for new interconnections or existing interconnections seeking to make a qualified change as defined by the Planning Coordinator, **in conjunction with its Transmission Planner(s)**, under Reliability Standard FAC-002-4 Requirement R6.”

R3.2 and R3.3: Update the sub-requirements to include “as defined by the Planning Coordinator under Reliability Standard FAC-002-4 Requirement R6” and “in conjunction with its Transmission Planner(s)”.

The updated sub-requirements would read:

(R3.2) “Procedures for notifying those responsible for the reliability of affected system(s) of new interconnections or existing interconnections seeking to make a qualified change **as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Reliability Standard FAC-002-4 Requirement R6.**”

(R3.3) Procedures for confirming with those responsible for the reliability of affected systems that new Facilities or existing Facilities seeking to make a qualified change **as defined by the Planning Coordinator, in conjunction with its Transmission Planner(s), under Reliability Standard FAC-002-4 Requirement R6** are within a Balancing Authority Area’s metered boundaries.

These changes will provide consistency and clarity as the term “qualified change” is not defined within the Standard but by the Planning Coordinator per FAC-002-4 R6.

CEHE recommends that the following updates be considered for the proposed FAC-002-4:

R1, R1.1, R2, R3, R4: Update the requirement/sub-requirements to include “in conjunction with its Transmission Planner(s)”. The updated requirement/sub-requirements would read:

(R1) Each Transmission Planner and each Planning Coordinator shall study the reliability impact of: (i) interconnecting new generation, transmission, or electricity end-user Facilities and (ii) existing interconnections of generation, transmission, or electricity end-user Facilities seeking to make a qualified change as defined by the Planning Coordinator, **in conjunction with its Transmission Planner(s)**, under Requirement R6. The following shall be studied:...

(R1.1) The reliability impact of the new interconnection, or existing interconnection seeking to make a qualified change as defined by the Planning Coordinator, **in conjunction with its Transmission Planner(s)**, under Requirement R6, on affected system(s).

R2. Each Generator Owner seeking to interconnect new generation Facilities, or existing interconnections of generation Facilities seeking to make a qualified change as defined by the Planning Coordinator, **in conjunction with its Transmission Planner(s)**, under Requirement R6, shall coordinate and cooperate on studies with its Transmission Planner or Planning Coordinator, including but not limited to the provision of data as described in R1, Parts 1.1-1.4.

R3. Each Transmission Owner and each Distribution Provider seeking to interconnect new transmission Facilities or electricity end-user Facilities, or existing interconnections of transmission Facilities seeking to make a qualified change as defined by the Planning Coordinator, **in conjunction with its Transmission Planner(s)**, under Requirement R6, or electricity end-user Facilities, shall coordinate and cooperate on studies with its Transmission Planner or Planning Coordinator, including but not limited to the provision of data as described in R1, Parts 1.1-1.4.

R4. Each Transmission Owner shall coordinate and cooperate with its Transmission Planner or Planning Coordinator on studies regarding requested new or existing interconnections seeking to make a qualified change as defined by the Planning Coordinator, **in conjunction with its Transmission Planner(s)**, under Requirement R6, to its Facilities, including but not limited to the provision of data as described in R1, Parts 1.1-1.4

Likes 0

Dislikes 0

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1

Answer

Document Name

Comment

None

Likes 0

Dislikes 0

Response

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

Answer

Document Name**Comment**

Reclamation recommends FAC-001 R3.1 be revised as follows:

From

Procedures for coordinated studies and identifying the impacts on affected systems ...

To

Procedures for coordinating studies and identifying the impacts on affected systems ...

Reclamation also recommends FAC-001 R4.1 be revised as follows:

From

Procedures for coordinated studies of new interconnections ...

To

Procedures for coordinating studies of new interconnections ...

Reclamation disagrees with the change to the Severe VSLs for FAC-001 R3 and R4. The VSLs already specify "Part 3.1 through Part 3.3" and "Part 4.1 through Part 4.3." The addition of "three parts of" is redundant. To fix this problem and apply consistency for all VSLs for both R3 and R4, Reclamation recommends changing the VSLs by adding parentheses as follows:

R3. Moderate

From

The Transmission Owner failed to address one part of Requirement R3 Part 3.1 through Part 3.3.

To

The Transmission Owner failed to address one part of Requirement R3 (Part 3.1 through Part 3.3.)

R3. High

From

The Transmission Owner failed to address two parts of Requirement R3 Part 3.1 through Part 3.3.

To

The Transmission Owner failed to address two parts of Requirement R3 (Part 3.1 through Part 3.3.)

R3. Severe

From

The Transmission Owner failed to address three parts of Requirement R3 Part 3.1 through Part 3.3.

To

The Transmission Owner failed to address three parts of Requirement R3 (Part 3.1 through Part 3.3.)

R4. Moderate

From

The Generator Owner failed to address one part of Requirement R4 Part 4.1 through Part 4.3.

To

The Generator Owner failed to address one part of Requirement R4 (Part 4.1 through Part 4.3.)

R4. High

From

The Generator Owner failed to address two parts of Requirement R4 Part 4.1 through Part 4.3.

To

The Generator Owner failed to address two parts of Requirement R4 (Part 4.1 through Part 4.3.)

R4. Severe

From

The Generator Owner failed to address three parts of Requirement R4 Part 4.1 through Part 4.3.

To

The Generator Owner failed to address three parts of Requirement R4 (Part 4.1 through Part 4.3.)

Likes 0

Dislikes 0

Response

Terry Harbour - Berkshire Hathaway Energy - MidAmerican Energy Co. - 1

Answer

Document Name

Comment

MEC supports the MRO NSRF comments.

Likes 0

Dislikes 0

Response

Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1

Answer

Document Name

Comment

AEPCO signed on with ACES comments below:

While ACES agrees with all of the proposed changes, the adequacy of the “qualified change” definition the Planning Coordinator (PC) develops is not addressed. Proposed changes to FAC-001 and FAC-002 are meant to address confusion and potential reliability issues within the industry stemming from potential differences to what is considered “materially modifying”. While the proposed changes should eliminate potential confusion amongst coordinating entities, it does not ensure the definition is adequate.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

No additional comments.

Likes 0

Dislikes 0

Response

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

Answer

Document Name

Comment

Nothing futher, thank you.

Likes 0

Dislikes 0

Response

Jennifer Malon - Jennifer Malon On Behalf of: Derek Silbaugh, Black Hills Corporation, 3, 5, 1, 6; Don Stahl, Black Hills Corporation, 3, 5, 1, 6; Seth Nelson, Black Hills Corporation, 3, 5, 1, 6; - Jennifer Malon

Answer

Document Name

Comment

BHC would recommend eliminating the “make publicly available” verbiage as it has not been utilized within other Reliability Standards. Recommendations for replacement may include “make available the current definition” as identified in MOD-001-1a R5.

Likes 0

Dislikes 0

Response

Kevin Conway - Public Utility District No. 1 of Pend Oreille County - 1,3,5,6

Answer

Document Name

Comment

These changes seem to punt the problem to the Planning Coordinators, do not promote consistency throughout the industry, and will add risk to the facility owners who may have to show compliance to multiple definitions of multiple PCs.

Likes 0

Dislikes 0

Response

Diane Landry - Public Utility District No. 1 of Chelan County - 1, Group Name CHPD

Answer

Document Name

Comment

The term “affected systems” is also a FERC defined term which refers to “an electric system other than the Transmission Provider’s Transmission System that may be affected by the proposed interconnection.” Use of the term “affected systems” is confusing in a similar way as the term “materially modified” is confusing. Is it the intent of both FAC-001-4 and FAC-002-4 that wherever the term “affected system” is used it is in reference specifically to systems outside of the system to which the interconnection request is made? Because of industry familiarity with the FERC definition, it is inferred that NERC’s meaning of the term affected system is not in reference to a utility’s own system but rather to any impacted neighboring system. However, it appears that the use of the term “affected systems” in FAC-002-4 is meant to cover *both* the system being interconnected to *as well as* other surrounding systems, although it’s not clear. For example, is the intention of FAC-002-4 R1.1 to only evaluate “the reliability impact... on affected systems,” meaning those systems outside of the the interconnection request, or is the intent to evaluate the reliability impact to all systems that may be impacted, both the interconnecting system as well as surrounding systems? Use of the term in FAC-001-4 R3 and R4 appears to be more consistent with the FERC definition, but clarification of the intent of the term “affected system” would help ensure consistent interpretation.

Likes 0

Dislikes 0

Response