Unofficial Comment Form

Project 2020-05 Modifications to FAC-001-3 and FAC-002-2

**Do not** use this form for submitting comments. Use the [Standards Balloting and Commenting System (SBS)](https://sbs.nerc.net/) to submit comments on **Project** **2020-05 Modifications to FAC-001-3 and FAC-002-2 Standard Authorization Request (SAR).** Comments must be submitted by **8 p.m. Eastern, Friday, December 11, 2020.**

Additional information is available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2020-05-Modifications-to-FAC-001-and-FAC-002.aspx). If you have questions, contact Senior Standards Developer, Alison Oswald (via email), or at 404-446-9668.

## Background Information

The NERC Inverter-based Resource Performance Task Force (IRPTF) undertook an effort to perform a comprehensive review of all NERC Reliability Standards to determine if there were any potential gaps or improvements. The IRPTF identified several issues as part of this effort and documented its findings and recommendations in the “IRPTF Review of NERC Reliability Standards White Paper,” which was approved by the Operating Committee and the Planning Committee (now part of the Reliability and Security Technical Committee (RSTC)) in March 2020. Among the findings noted in the white paper, the IRPTF identified issues with FAC-001-3 and FAC-002-2 that should be addressed.

Consistent with the IRPTF recommendations, the scope of the proposed SAR includes revisions to FAC-001-3 and FAC-002-2 to clarify requirements related to material modifications of Facilities. The purpose of FAC-001-3 is to ensure that Facility interconnection requirements exist for Transmission Owners and Generator Owners when connecting new or materially modified facilities. The purpose of FAC-002-2 is to ensure studies are performed to analyze the impact of interconnecting new or materially modified facilities on the Bulk Electric System (BES). The IRPTF identified an opportunity to clarify the term “materially modified” within these standards and to specify which entity is responsible for determining what is considered a material modification. The RSTC endorsed the SAR on June 10, 2020.

## Questions

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

[ ]  Yes

[ ]  No

Comments:

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

Comments: