### **Comment Form for Project 2010-10 — Modifications to FAC-012 and FAC-013 for Order 729 — Draft FAC-013-2 Standard**

Please **DO NOT** use this form. Please use the [electronic comment form](https://www.nerc.net/nercsurvey/Survey.aspx?s=d4e868acf20646a9877cbefe256b4c94) located at the link below to submit comments on the proposed SAR and modifications proposed FAC-013-2 — Planning Transfer Capability. Comments must be submitted by **January 8, 2011**. If you have questions please contact Darrel Richardson at [Darrel.richardson@nerc.net](mailto:Darrel.richardson@nerc.net) or by telephone at 609-613-1848.

<http://www.nerc.com/filez/standards/Project2010-10_FAC_Order_729.html>

**Background Information:**

The SAR for Project 2010-10 – Modifications to FAC-012 and FAC-013 for Order 729 proposes modifications to the following standards:

* FAC-012-1 — Transfer Capability Methodology
* FAC-013-1 — Establish and Communicate Transfer Capabilities

In Order 729, FERC ruled that the ATC standards developed in Project 2006-07 did not completely address the topics covered in FAC-012 and -013 and did not fully address the associated directives from Order 693. Accordingly, FERC denied the portions of the implementation plan that would have retired these standards, and instead directed NERC to use the standards development process to make changes to the FAC standards and file those changes with FERC no later than 60 days prior to the effective date of the standards, which is currently believed to be on or after April 1, 2011 (requiring the proposed changes to be filed on or before January 28, 2011).

NERC has an obligation to address FERC’s directives. It was the intent to identify all the applicable FERC directives and incorporate them in the draft standard. A second draft of the proposed standard has been developed that attempts to address the applicable FERC directives as-well-as address concerns raised by the industry during the first posting. Please review the proposed draft standard in its entirety and answer the following questions by using the electronic comment form.

**You do not have to answer all questions. Enter all comments in Simple Text Format.**

1. The SDT has defined the term Near-Term Transmission Planning Horizon. The definition reads “The transmission planning period that covers year’s one through five.” (This definition was originally developed by the Assess Transmission Future Needs SDT and has been moved to this project as this project will be completed before the Assess Transmission Future Needs project.) Do you agree that this term provides clarity as to the period the standard applies?

Yes

No

Comments:

1. The SDT has modified the Purpose statement. The Purpose statement now reads “To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of the ability to transfer energy (in the Near-Term Transmission Planning Horizon) to identify potential future weaknesses and limiting Facilities that could impact the reliability of the Bulk Electric System (BES).” Do you agree that the revised Purpose statement provides greater clarity as to what the standard is intended to accomplish?

Yes

No

Comments:

1. The SDT has added a Requirement R6. The Requirement R6 reads “If a recipient of a documented Transfer Capability assessment requests data to support the assessment, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request.” Do you agree that the Requirement is necessary for verification of the assessment?

Yes

No

Comments:

1. The SDT has modified the VSLs to better align with the Requirements. Do you agree that the revised VSLs are now appropriately aligned with the Requirements?

Yes

No

Comments:

1. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standard.

Comments: