

FAC Alert Recommendation Update Webinar Participant Q&A

On March 20, 2012, NERC hosted a webinar to present the FAC Alert Recommendation Update. This document provides answers to many of the questions NERC has received.

1. Are the lines that have not been mitigated currently de-rated?

Most of the lines with discrepancies were derated. A few cases revealed a reliability reason which prevented derating while others may have been at the very edge of the tolerance. In the tolerance cases, the registered entity declared a discrepancy but there may not be a need to de-rate.

2. How does an entity request an extension?

Extensions should be requested through your Regional Entity contact person for the FAC Alert effort.

3. What is the difference between Ground Survey & Field Inspection?

NERC and the Regional Entities are not providing definitions. However, in general, field inspections describe where an entity patrols the line and performs measurements between the conductor and the ground or structure below the conductor. A ground survey generally describes where an entity uses a device such as a "transit-level" from a common reference point to measure the distance between the conductor and the ground or other structure.

4. You have listed the discrepancies (5,100) by miles of line (73,000), how many of the 4,300 circuits had discrepancies?

Because many of the registered entities did not provide information on the number of circuits corresponding to their discrepancies found, the percentage of the total 4300 circuits which had discrepancies could not be accurately determined and, therefore, were not included in the data.

5. In this process do any of the entities measure the clearances for vegetation management? If yes, do you have data available?

That may or may not have been discussed in each registered entity's assessment plan. It was not specifically requested and no metrics have been developed with respect to vegetation management practices.

6. Will or can this slide deck be made available?

The slides have been posted to the [Facility Ratings Alert](#) page on the NERC website.

7. What percentage of permanent derates are 500kV?

Approximately 600 miles and nine (9) 500kV circuits have been derated as of January 2012. This does not include lines that are still being evaluated. At this time, we have not determined whether the derates are permanent or temporary.

8. What is the total number of circuits identified for assessment?

As of January 2012, approximately 4,300 high priority transmission circuits have been assessed. This number does not include assessments where the entity was granted an extension.

9. What is the purpose of asking for number of circuits versus the mileage? Circuits vary vastly in distances.

The information was requested to assist with metric preparation.

10. What is the difference between raise transmission/lower distribution versus increase wire clearances?

Raising a transmission structure may mean that a structure was replaced that was taller than the previous structure. Increasing wire clearance may be a re-conductor that has less sag and therefore increases the clearance.

11. Please review the 2012/2013 due dates - expectations for reporting. Also, will the medium and low priority systems/lines be notified and/or reminded by NERC of their reporting obligations?

NERC and the Regional Entities will discuss the expectations and due dates for medium and low priority transmission assessments. Currently, two assessments are due for medium priority lines- July 15, 2012 is the first reporting due date for medium priority lines and the second reporting deadline for medium lines is January 15, 2013. NERC will conduct update webinars similar to those for the high priority lines.

12. Do you have the percent of spans that contained discrepancies?

This metric is not possible to derive from the data collected. The development team did not believe that information was needed and would add more burden on the entities to provide.

13. What is the process if entities are not able to fully complete permanent mitigations by December 31, 2012?

NERC encourages entities to work with their Regional Entity to develop a completion plan.

14. Is there an interim reporting deadline for high priority lines that are still being mitigated, or just the report within 12 months after identifying the discrepancy?

Within 12 months from the time a discrepancy is confirmed, the registered entity is asked to complete the remediation work to correct the discrepancy. The entity is also being asked to report to their respective Regional Entity when the remediation is complete.

15. Are we expected to report on high priority repairs with our medium priority assessment update in July 2012?

Completion of the remediation work associated with a discrepancy can be reported to the Regional Entity as the work is completed or it can be included in the next report for medium assessments due on July 15, 2012.

16. Is NERC taking any action with entities who have not responded to the NERC Alert or have not started on mitigations and/or put interim mitigations in place?

Each Regional Entity contact has worked with all the registered entities within their region to collect the necessary information and be the liaison for the registered entities and NERC. At this time all registered entities have been responsive. NERC and the Regional Entities are pleased with the overall response received with the Alert.

17. How can we use the same spreadsheet if you be enhancing the spreadsheet?

There are not any enhancements planned as of yet.

18. Should you fill out a separate form for each site? Or can you combine them on one spreadsheet?

To reduce confusion with using multiple spreadsheets, NERC is encouraging entities to use the same spreadsheet for their medium assessments as they used with the high priority assessments. NERC can filter out data it does not want to report on.

19. If remediation cannot be completed within 12 months then a mitigation plan is to follow. What is that process?

The NERC Alert requests entities to complete remediation within 12 months of the confirmed discrepancy. If the entity is not able to meet this timeframe, the entity is encouraged to provide an

explanation for not meeting the deadline and work with their Regional Entity to determine a plan for completion.

20. What are the compliance implications to this Alert?

The Alert is not a standard requirement; however, NERC's Rules of Procedure asks that entities respond to NERC and Regional requests associated with a NERC Alert Recommendation. NERC encourages as much cooperation and participation as possible so that the bulk power system can be operated more reliably.