

## Q&A – FAC Assessment Plan Review Criteria (05/12/2011)

### Introduction

On May 12, 2011, NERC hosted a webinar to present the FAC Assessment Plan Review Criteria. This document provides answers to many of the questions NERC has received.

1. When will this presentation be available on NERC's website for playback?

*It is now located on the [FAC Alerts](#) webpage*

2. When will entities hear back by on whether their plans are acceptable? What percentage of plans have been reviewed? We understood from WECC that they have reviewed few so far. We are preparing to award contracts for the work to be done. When will our RE let us know if our plan is adequate? What is the LATEST date that RE will notify utility of acceptability of their plan? It may not be possible to secure funding and begin work until that occurs.

*By the first week in June, 2011; All plans have been reviewed by each of the Regional Entities.*

3. What if you haven't heard from the RE? Will there be an extension for the December 2011 reporting deadline?

*You should have been contacted by your Regional Entity by the first week in June. A bi-annual report is due on July 15th and January 15th of each applicable plan year. Extensions to the report due dates will only be granted for extenuating circumstances. The assessment due dates are 12/31/2011, 12/31/2012 and 12/31/2013 for the high, medium, and low priority assets. Requests for assessment date extensions will be reviewed by the Regional Entities and will be granted for extenuating circumstances.*

4. For assessment plan review summary, do numbers represent percents, e.g., four hundred plus plans is 57% of total submitted?

*Yes, that is correct.*

5. What is meant by heavily loaded transmission lines on slide 11?

*Heavily loaded means that the line at any given time is loaded near its facility ratings*

6. Can an entity revise their plan based on this new "bright line" information?

*You will receive feedback on your assessment plan. If the Region believes it should be adjusted, then yes your plan should be revised accordingly.*

7. By reporting a discrepancy for an asset that is derated, do you mean overall facility rating?

*If a discrepancy is reported, this means the section of line containing the discrepancy is being derated in realtime. Only if you choose not to remediate and restore it to its original rating would this result in your facility rating being derated.*

8. Can a TO perform studies to determine what are its high priority lines, rather than use the standard definition?

*If you have or intend to perform studies to determine high priority lines, and your method for determining what is high priority is equally sound and technically feasible as the prioritization criteria, then you may contact your RE and request a deviation from the prioritization provided in the Review Criteria.*

9. How will the semi-annual report be provided to Regional Entities? How will this data be kept secure?

*Each Owner will use the Owner Update Report (Excel Spreadsheet) posted on the [FAC Alerts](#) Webpage;; The information being requested is not CEII in nature and will not require added security.*

10. Our utility has no High or Medium priority assets. We are doing our assessments on all of our lines. Do we submit our first report in July 2011 or in the year appropriate for a low-priority line?

*You are allowed to report the information in either manner. If you report low priority lines in 2011 or 2012, then change the title of the Report form to Low Priority.*

11. Are there specific contact individuals within each region and if so, do you have a list?

*WECC : Branden Suddeth - [Branden@wecc.biz](mailto:Branden@wecc.biz);  
TRE: Curtis Crews - [curtis.crews@texasre.org](mailto:curtis.crews@texasre.org);  
SPP: Debbie Currie - [dcurrie@spp.org](mailto:dcurrie@spp.org); Alan Wahlstrom - [awahlstrom@SPP.ORG](mailto:awahlstrom@SPP.ORG);  
MRO: Dan Schoenecker - [dr.schoenecker@midwestreliability.org](mailto:dr.schoenecker@midwestreliability.org);  
SERC: Carter Edge - [cedge@serc1.org](mailto:cedge@serc1.org);  
FRCC: Hassan Hamdar - [hhamdar@frcc.com](mailto:hhamdar@frcc.com);  
RFC: John Idzior - [john.idzior@rfirst.org](mailto:john.idzior@rfirst.org); Jerry Mosier - [jmosier@npcc.org](mailto:jmosier@npcc.org);*

12. On spreadsheet the number of discrepancies is shown as one, however there are multiple crossing discrepancies. Why the difference?

*This is due to an editorial error. Column C "Number of Discrepancies" should read 48. The total number of discrepancies in column C should match the breakdown total in column J.*

13. What do we submit if no assessments are complete by July 15, 2011?

*Provide a brief description of the progress you are making towards implementing your assessment plan. The Owner Update spreadsheet won't be necessary.*

14. Could you define what the NERC SDX common name is?

*SDX means System Data Exchange and is used to represent Generation and transmission outage information. This information is contained in a database reviewable by TOPs, RCs, and BAs so their models take into account the correct status of the generation and transmission facilities.*

15. Do line priorities need to be reassessed on an annual basis to consider changing loading conditions?

*If there is a large increase or decrease in the loading of a particular line, then the Owner may want to consider moving the priority level either up or down to reflect the new condition. Refer to the [Assessment Plan Review Criteria](#) document*

16. What percent of the BES transmission system consist of generation tie-line? Are there significant BES reliability gains by including these facilities on the scope of this effort? What is the definition of a tie-line?

*NERC does not have information pertaining to the percent of BES that consist of tie-line. For "high" priority generation tie-lines, there are reliability gains to be achieved. The Assessment Plan Review Criteria document shows that the only updates required from GOs (who are not TOs) are for High priority tie-lines. In general terms, tie-lines are the section of transmission line between the Generator step up transformer (GSU) and the interconnection point to the Transmission Owner.*

17. Under discrepancies found we will be summarizing the discrepancies. Under remediation work performed do you want a summary of actions taken or do you want it broken out by each discrepancy?

*Under the remediation work performed, it is not necessary to tie each remediation to each discrepancy. Rather, a summary of each type of remediation performed to alleviate the discrepancy(ies) is desired.*

18. Do the circuit miles of a circuit also go on the second spreadsheet for the miles of circuit that did not have a problem? the problem may be within 500 feet and the rest of the circuit miles could be good.

*If a single span of a line has a discrepancy, then it will most likely cause the de-rate of the entire section of the transmission line, therefore the entire line should listed under the discrepancies tab. On the "No discrepancy" tab of the reporting form, NERC is seeking the number of miles of transmission line that did not have any discrepancies. Therefore, if a section of line has at least one discrepancy, the Owner is not to include any portion of that section of line in its "Number of miles evaluated with no discrepancy" calculation.*

19. In the second spreadsheet tab for your example entry, you show "1" discrepancy in the "Basic" information tab, but list approximately 48 issues in the "Description" tab.

*There is no correlation in the example between the 48 issues and the 1 discrepancy. Had this been a real example of reporting, for every discrepancy there would have been an equal number of types of discrepancies found.*

20. During the presentation, it was said that only the issues that cause the line to be derated, but the reporting form asks for all?

*The reporting form is consistent with the Review Criteria. A discrepancy is to be counted only when it results in a (temporary or permanent) derating.*

21. What is a definition for generator tie line?

*In general terms, Tie-lines are the section of transmission line between the Generator step up transformer (GSU) and the interconnection point to the Transmission Owner.*

22. Please clarify if the generator tie-lines discussed on slide 15 are the circuits on the high voltage side of the generator step up transformer.

*That is correct.*

23. Who will receive the feedback within the registered entity? Will it be the Primary Compliance Contact?

*Generally, that will be the case.*

24. Is it true that the utilities have 12 months from the date of discrepancy identification to remedy the discrepancy? Does NERC expect the line to be derated until the discrepancy is corrected during that 12 month period?

*If the Owner has confirmed with its TOP and RC that a derate is necessary, the 12 month remediation period begins at the point in time when it is confirmed that the derate is required. Yes, NERC expects the transmission line to be derated during this time.*

25. High discrepancies may not be resolve until 2012, so the work column may not be able to be completed until next year. We may be able to complete some medium items this year. Recommend that semi-annual report spreadsheet allow for reporting High, Medium, and Low as presently Spreadsheet only shows high.

*Simply change the heading on the reporting form to Medium or Low priority and send separate reporting forms for those type lines.*

26. On Low Priority actions (slide 14), Transmission lines less than 230 kV were identified. Are these Transmission Lines that are PART OF THE BULK ELECTRIC SYSTEM?

*That is correct.*

27. I was unable to open the documents dated 5/11/2011 on the alerts page.

*That has been corrected.*

28. On the reporting spreadsheet, for the circuit name are you looking for circuit number or the from Substation name to the to Substation name? How should tie lines be listed (if only a portion of the line)?

*NERC is suggesting that you use the SDX common name if in the Eastern Interconnection. In ERCOT or WECC, use the comparable SDX naming convention. If Generator Tie-lines have an SDX-type naming convention, then use it. Otherwise, refer to it using the Unit's "name" Tie-line.*

29. Can you address the issue of entities only verifying a sampling of spans or lines in their assessments?

*NERC is recommending each high priority circuit be inspected in 2011.*

30. Is "number of discrepancies" and number of potential issues the same thing?

*Number of discrepancies refers to only the number of discrepancies found resulting in the circuit being derated.*

31. If an entity has completed LiDAR assessment of their entire BPS (High, Medium and Low) prior to the NERC Alert should they report on all in July, or just High?

*It is acceptable to report all in July. However, we ask that you change the title on the reporting form for Medium and Low Priority lines to make it appropriate for them. Then send in separate reports for High, Medium, and Low priority transmission lines.*

32. As a generator owner, my high voltage overhead lines are just from the high voltage bushing of the step-up transformer to the point of interconnection with the Transmission Owner. In most cases these lines are only a few hundred feet long traveling over parking lots, roads, etc... where there is no vegetation. In addition, in all cases but one all of our lines are located on our property. Therefore is it acceptable to just do a physical walkdown/inspection to just make sure nothing has been added under that line, and that there is no potential for vegetation growth and not do LIDAR (or similiar) survey method?

*A foot patrol inspection is acceptable as long as you are able to confirm the information requested in Section B of the Assessment Plan Review Criteria document.*

33. What should be done if the schedule slips?

*Contact your Regional Entity Representative and explain your circumstances. Then, the Regional Entity Representative will either accept or decline your request for additional time.*

34. If we had asked for an extension on the assessment due dates - and never heard from NERC or WECC that it was not acceptable, what will happen now if they come back and say that our plan dates are not acceptable.

*If the Owner requested an extension by the January 18, 2011 due date, the Region will contact you by the end of May, 2011 to respond to your request and to provide information on whether your assessment plan is acceptable.*

35. Will FERC be given the detailed information that is collected by NERC?

*FERC will be provided metric report data (consolidated data) from the reporting forms due in July. It is not anticipated that FERC will be provided the specific information contained in each report form. Additionally, FERC will not see any specific information related to reporting forms from Canadian Transmission or Generation Owners.*

36. Discrepancy Tab Column A- What is significance of ID #? Column C - Total number of discrepancies or types or line has discrepancy? Column H- What if we decide not to derate but there will be corrective action? Column T- List all work or major work? NO Discrepancy Tab Column A- What is significance of ID #? Column C- Just total Miles by Kv? Total miles High priority- Just miles without discrepancy?

*This is information that will be extracted and consolidated into metric data for NERC reports to the BOT or to governmental agencies.*

37. How will compliance be treated in terms of enforcement?

*This is not a compliance process but in the event a registered entity finds the need to self report a potential violation due to a discovery related to the NERC Facility Ratings Alert NERC and Regional Entity Staff will hold the processing of all possible violations reported as a result of the assessments until the Owner's assessments are complete as long as the Owner is proceeding in good faith to complete the assessments in accordance with the timelines.*

38. It was our understanding that Transmission Lines not categorized as Bulk Transmission System were to be evaluated and assessed, I thought one of your meeting slides showed all 115kV lines including radial 115kV lines that are not categorized as Bulk Transmission? Thanks

*This FAC Alert Recommendation is applicable to all 100 kV and above transmission lines.*

39. Will the RE's post the contact name on their websites?

*The Regional Entity contact names are posted on the [FAC Alerts](#) webpage.*

40. Do you want all the lines identified in the spreadsheet this year, even though we only need to complete assessments of high-priority lines?

*NERC and the Regions are only expecting the High priority assessment plans to be completed by the end of 2011. If the Owner has completed all priority assessment plans in 2011, then simply change the title name to Medium and Low and report each separately to your Region.*

41. Our company completed such an assessment in the 2007/2008 timeframe. Does NERC require a periodic review? If so, what is the review cycle.?

*Contact your respective Regional Entity to confirm whether or not assessments completed in the timeframe you stated is acceptable and what future review cycles should be.*

42. In previous webinars, ERC suggested that entities could use a line with clearance issues without derating. Is that still the case? Would the entity still need to report that as a "discrepancy"?

*If the Owner's assessment reveals that there is a discrepancy (in your case clearance issues) and the discrepancy is confirmed to result in a derate, then the Owner is being requested to derate the line until remediation can be completed.*

43. It was our understanding that Transmission Lines categorized as Bulk Transmission System were to be evaluated and assessed. I thought one of your meeting slides showed all 115kV lines, including radial 115kV lines that are not in the BES, were to be assessed and report to NERC, is this true?

*This FAC Alert Recommendation is applicable to all 100 kV and above transmission lines. Please refer to the current NERC BES definition in the NERC Glossary.*

44. As discrepancies are identified, priorities may change as other lines will now be expected to carry higher flows closer to rating. As such, the mileage of H,M, L will likely change. Can we assume that NERC and regions recognize that the total fields will be continuously evolving?

*NERC and the Regions understand this. It may be necessary to run studies and/or assessments to evaluate the future reliability of the BES if many discrepancies are found.*

45. Does every transmission line discrepancy have an associated de-rating when the line is the limiting element, or are alternative actions such as erecting safety barriers on high stress days allowed? If so, then we would report a derate of 0?

*Transmission lines operating under given conditions which have a discrepancy would be in a de-rate scenario.*

46. Can NERC speak to the reliability benefit that is expected to be derived by knowing what specific remediation work was done?

*NERC is accumulating data associated with the types of remediation being performed to alleviate de-rating conditions as well as other metric data. This information will assist in the overall evaluation of the success of this Alert Recommendation.*

47. What is a foot patrol and how does it relate to the four measurement methodologies presented? Is foot patrol coupled with desktop sufficient?

*Foot Patrol does not have a specific definition. However, walking the lines in conjunction with some type of measuring device (for measuring clearances) is an acceptable method.*

48. There may be cases where derating is the only expected outcome, i.e. there will be "no work". How should that be reflected?

*The Owner should explain that de-rating the line is the remediation plan being taken rather than alleviating the condition causing the discrepancy.*

49. Why do Generator Owners have different due dates from other "high" equipment?

*Generator Owners as well as Transmission Owners are both being requested to complete their "high" priority assessment plans by the end of 2011.*

50. Can an entity elect to leave a line de-rated and not correct the discrepancy?

*That is an option assuming the decision does not jeopardize the reliability of the BES.*

51. Our original completion date submitted for our assessment is prior to the July 2011 reporting period. Do we basically now have until the first reporting period in July 2011 to complete our assessment?

*Each Owner has until December 31, 2011 to complete its "high" priority assessment plans and report the results to its Regional Entity by January 15, 2012. Please refer to the Assessment Plan Review Criteria for the medium and low priority due dates.*

52. What other options are available besides derating? Diverting load is essentially the same as derating.

*There are any number of options available other than de-rating. However, the options available to alleviate a particular discrepancy may be limited depending on the individual circumstances associated with the discrepancy. Your Regional Entity representative may have additional guidance on alternative options.*

53. For generation tie-in line with 500kV, approx. 1.5-2.0mil each circuit, these lines should be on High priority category? Please clarify. Thanks

*The Review Criteria is very specific in defining what is a "high" priority Generator Tie-Line. Please refer to Section A of the Assessment Plan Review Criteria for information related to high priority Generator Tie-Lines. In this case it would involve more than just voltage level to qualify the line as High Priority.*

54. Does the 12 month clock start ticking on the date on which the violation is discovered or on Jan 1 of the next year?

*The 12 month clock to complete the remediation plan for a particular discrepancy starts when the discrepancy has been confirmed and the de-rate is necessary.*

55. In the case where a field check results in a line being de-rated, what criteria would be used to determine if any mitigation is needed, rather than just leaving the line at the corrected, lower rating?

*The decision to either implement a particular remediation plan to restore its original rating or resort to de-rating the line indefinitely is the Owners call.*

56. If the proposed brigh line BES is approved and lines are exluded as part of a Local Distribution Network, will these lines fall out of consideration?

*Please refer to the Assessment Plan Review Criteria under Section A for a detailed explanation of which lines are high, medium, and low priorities.*

57. If LiDAR results indicate a potential encroachment does NERC consider this a verification, or is it when the entitiy confirms the actual field existence of a problem?

*LIDAR calculations and measurements have been shown to be very accurate. If LIDAR shows there is a significant deviation between design and as-built, then LIDARs results are an acceptable method for confirming there is a discrepancy. Once the discrepancy information has been reviewed and confirmed, the line should be de-rated.*

58. How do you handle a line that has descrapancies and the rating becomes zero? De-energization is not an option because "lights" will go out.

*The scenario you describe sounds too extreme. Please contact your Regional Entity for assistance with any further questions on this.*

59. Is it NERC's expectation that lines should be checked against all NESC clearance requirements or only checked for Maximum Sag?

*NERC requests that each Owner review its Facility Rating Methodology and compare those design conditions to the as built conditions. If deviations exist between them that are outside the Owners tolerances, then there is a discrepancy.*

60. If we conducted initial analysis and identified a possible discrepancy and didn't confirm the actual discrepancy until secondary analysis was completed, we would use the date we had certainty there was a discrepancy as a beginning date for 12 month remediation timeline.

*NERC requests that each Owner confirm the discrepancy. Once the confirmation shows a de-rate is necessary, it is at this point the 12 month clock starts for remediating the condition.*

61. If an assessment identifies an issue which can be mitigated (fencing, restricting vehicular traffic etc.) and the line rating remains the same (no derate) is this a discrepancy? If not, does the issue need to be fixed within one year?

*The types of remediation provided in your examples do not appear to be reasonable remediation plans. Please contact your Regional Entity for further assistance.*

62. How will non-compliance with milestone filings or insufficient 'plans' be dealt with from an enforcement perspective?

*This effort is not a compliance process. If for some reason a registered entity can not meet a reporting timeframe it is suggested that they inform their Regional Entity representative prior to the due date.*

63. Why does it matter to FERC the specifics of a discrepancy and the method of remediation, as compared to notice of a generic discrepancy and notice of remediation?

*FERC is interested in the reliability of the BPS. Section 215 of the Federal Power Act makes them responsible for the reliability of the BPS.*

64. If you use an alternative method to avoid derating, is it a discrepancy?

*The deviation between the design and as-built condition is a discrepancy if the deviation results in the need to de-rate the line. Once confirmation has been received that there is a discrepancy, the alternative method would need to immediately take place. Otherwise, until the alternative method is completed, de-rating of the line would take place.*

65. If an assessment is performed and a discrepancy is found (derate) but the previous rating was higher than the system needed, why would the discrepancy be fixed?

*If the Owner has rated the line in an overly conservative manner, and the de-rate is still below the Facility Rating Methodology rating, then a de-rate is not needed from the design rating. However, there would be a de-rate from the rating in place at the time of the discrepancy. If this answer is not applicable to your question, I suggest you contact your Regional Entity.*

66. If our company chooses to derate a line and operate in that manner because loading on the line does not justify the cost to get the line back to its design rating, is this acceptable?

*Yes, it is acceptable assuming the decision does not jeopardize the reliability of the BES.*

67. If a circuit has 10 miles of no discrepancies and 1 mile of discrepancies, do we include the 10 miles on the No Discrepancy tab and list the 1 mile on the Discrepancy tab or do we list the entire circuit on the Discrepancy tab and report no mileage on the No Discrepancy tab?

*If a single span of a line has a discrepancy, then it will most likely cause the de-rate of the entire section of the transmission line, therefore the entire line should be listed under the discrepancies tab. On the "No discrepancy" tab of the reporting form, NERC is seeking the number of miles of transmission line that did not have any discrepancies. Therefore, if a section of line has at least one discrepancy, the Owner is not to include any portion of that section of line in its "Number of miles evaluated with no discrepancy" calculation. List the entire circuit on the Discrepancy Tab and report no mileage on the No Discrepancy tab.*

68. It may not be possible to develop a full work plan to mitigate the discrepancies until all analysis is completed. Budgets and resources need to be allocated. Does NERC and regions understand this. So there may be no means to complete a plan until Dec 2012. Also line outages need to be coordinated in the Region. Twelve months from the time any individual discrepancy is identified may not be possible.

*It is suggested that you contact your Regional Entity and discuss this matter with them. The eight regions have been coordinating this effort with NERC and are ready to work with registered entities with regards to the NERC Alert.*

69. Since the element has to be derated as soon as the discrepancy is found, why is a timeline required to remediate? Can't the derating stay in place permanently?

*If the Owner decides to make de-rating its remediation plan and doing so does not jeopardize reliability, then it is acceptable for the de-rate to stay in place indefinitely.*

70. You oversimplify the LiDAR process. The Lidar presents a data set. The data set must be analyzed via PLS-CADD and that analysis takes months. You make it seem to simple. The Lidar result must be validated prior to the designation of discrepancy.

*NERC understands that the use of LIDAR to confirm facility ratings may take time. This is why NERC established a three-year time period to complete the assessment of the high, medium and low priority facilities. Furthermore, the facility owner may, at its own discretion, choose an acceptable method other than LIDAR to confirm the facility ratings."*

71. If you discover a Discrepancy and derate a line, and you don't mitigate within 12 months, are you not able to employ mitigating measures after the 12 month period? Is the line subject to the derate forever? I'm not following what the penalties are if you don't mitigate within 12 months?

*NERC's main concern is reliability. If not remediating the de-rate in some way reduces reliability, then it is an issue that needs to be addressed. Once a discrepancy is confirmed, NERC requests that the Owner begin implementing its remediation plan and have it completed within 12 months of the confirmation. It is also acceptable for the Owner to change the remediation plan to de-rate the line indefinitely provided there are no reliability issues. Further information on your question can be addressed with your Regional Entity.*

72. Does the NERC Rating Alert only apply to BES?

*Please refer to the Assessment Plan Review Criteria under Section A for a detailed explanation of which lines are high, medium, and low priorities and which facilities this Alert pertains to.*

73. If a potential discrepancy is discovered, but the encroachment (pile of dirt) can be moved say, within a week, then we report no discrepancy?

*In the example mentioned, if the pile of dirt can be removed before the discrepancy is confirmed, then when reporting the discrepancy the "Date Line De-rate" field would be marked N/A and the "Date Work Completed" field date would be entered.*

74. Can you clarify if an Entity is able to re-prioritize their lines if they used an assessment criteria more stringent than today's recommendations?

*If the Owner's assessment plan was more stringent than the Assessment Plan Review Criteria, it is acceptable for the Owner to re-prioritize its transmission lines.*

75. Can an entity elect that derating the line is the final mitigation for a discrepancy?

*If the Owner has determined that permanently de-rating the line will not jeopardize reliability, then it is acceptable to consider de-rating the line indefinitely as your remediation plan.*