NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

July 22, 2015

Mr. Loye Hull
Office of Electric Reliability
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: *Recommendation to Industry: Consideration of Actual Field Conditions in Determination of Facility Ratings* issued October 7, 2010 and updated November 30, 2010

Dear Mr. Hull:

Following the issuance of the referenced "Recommendation to Industry" (FAC Recommendation) on October 7, 2010,[1] which was updated November 30, 2010,[2] the North American Electric Reliability Corporation (NERC) submitted a seventh summary report on February 14, 2014. The February 2014 report was intended to provide a final update on the progress that Transmission and Generator Owners have made toward completing remediation for discrepancies discovered on their high, medium and low priority Bulk Electric System transmission facilities. Due to the fact that remediation activities are on-going, NERC and the Regional Entities (Region) are continuing to work with Transmission and Generator Owners and continue to monitor the progress of these remediation activities. This report is intended to provide a brief status update of these remediation activities as of January 2015.

January 2015 Update on High, Medium and Low Priority Transmission Lines

The January 2015 data update is provided in Attachment 1. The first page of Attachment 1 includes summary tables with totals for the number of high, medium and low priority "Lines with Discrepancies" and "Discrepancies" that have been "Completed" or are "In Progress." Data is aggregated by Region. The summary tables also contain percent remediation totals for the amount of discrepancies and total circuits completed across all Regions for lines found to have at least one discrepancy, as well as the total number of circuits that currently have as-built field conditions consistent with their design.

Attachment 1 also contains bar graphs showing percent completion by Region for "Circuits Assessed with a Discrepancy" and "Discrepancies Assessed" for high, medium and low priority lines.

[1] *Recommendation to Industry Consideration of Actual Field Conditions in Determination of Facility Ratings* (October 7, 2010) http://www.nerc.com/fileUploads/File/Events%20Analysis/Ratings_Recommendation_to_Industry_20100929Final.pdf

[2] *Recommendation to Industry Consideration of Actual Field Conditions in Determination of Facility Ratings* (November 30, 2010) http://www.nerc.com/fileUploads/File/Events%20Analysis/Ratings%20Recommendation%20to%20Industry%20FINAL-REVISED.pdf

1. **High Priority Transmission Lines**

Six of the eight Regions have completed 100 percent of their high priority transmission facilities. The percent remediation totals across all Regions for discrepancies completed is 87 percent and for circuits completed is 93 percent. Given that 3,646 high priority facilities have been assessed during the course of the FAC Recommendation, 98.4 percent of all high priority transmission lines have as-built field conditions consistent with their design.

2. **Medium Priority Transmission Lines**

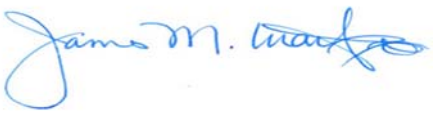
Four of the eight Regions have completed 100 percent of their medium priority transmission facilities. The percent remediation totals across all Regions for discrepancies completed is 74 percent and for circuits completed is 83 percent. Given that 6,514 medium priority facilities have been assessed during the course of the FAC Recommendation, 94 percent of all medium priority transmission lines have as-built field conditions consistent with their design.

3. **Low Priority Transmission Lines**

All of the Regions have on-going remediation activities for their low priority transmission facilities. The percent remediation totals across all Regions for discrepancies completed is 49 percent and for circuits completed is 46 percent. Given that 11,385 low priority facilities have been assessed during the course of the FAC Recommendation, 87.8 percent of all low priority transmission lines have as-built field conditions consistent with their design.

NERC will continue to periodically update FERC staff on the status of FAC Recommendation remediation activities. If you have any questions, please do not hesitate to contact me at (404) 446-9716 or via email at jim.stuart@nerc.net.

Respectfully submitted,



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Cc:

Kenneth Githens, FERC
Valerie Agnew, NERC
Steven Masse, NERC
Hugo Perez, NERC
Meredith Jolivert, NERC

Attachment 1

FAC Recommendation: Remediation Status Data - January 2015

FAC Recommendation: Remediation Status Data - January 2015 Update

High Priority

Region	Total Lines	Lines w/Discrepancies			Discrepancies		
		Total	Complete	In Progress	Total	Complete	In Progress
FRCC	388	90	90	0	1140	1140	0
MRO	315	103	103	0	1407	1407	0
NPCC	289	82	74	8	568	516	52
RFC	809	132	132	0	913	913	0
SERC	711	119	119	0	444	444	0
SPP	246	62	62	0	350	350	0
TRE	304	20	20	0	77	77	0
WECC	584	265	213	52	3172	2163	1009
NERC total	3646	873	813	60	8071	7010	1061

Discrepancies remediated	**87%**
Total circuits remediated	**93%**
Total circuits built to design	**98.4%**

Medium Priority

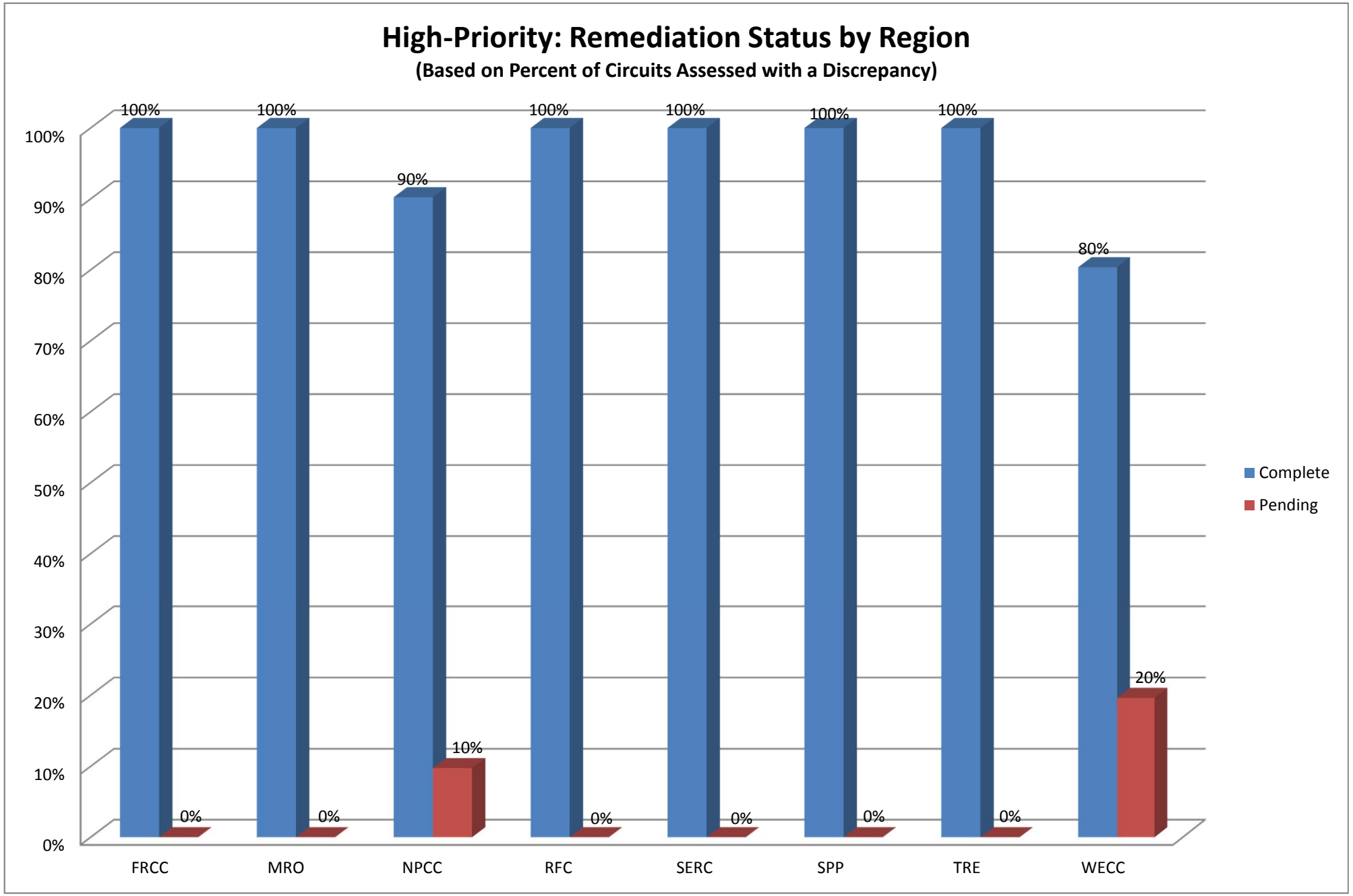
Region	Total Lines	Lines w/Discrepancies			Discrepancies		
		Total	Complete	In Progress	Total	Complete	In Progress
FRCC	673	297	297	0	2017	2017	0
MRO	408	188	149	39	2830	2170	660
NPCC	322	97	97	0	1026	1026	0
RFC	1064	375	375	0	3269	3269	0
SERC	1309	397	397	0	1559	1559	0
SPP	349	127	103	24	1963	1620	343
TRE	839	124	120	4	291	262	29
WECC	1550	656	329	327	8511	3885	4626
NERC total	6514	2261	1867	394	21466	15808	5658

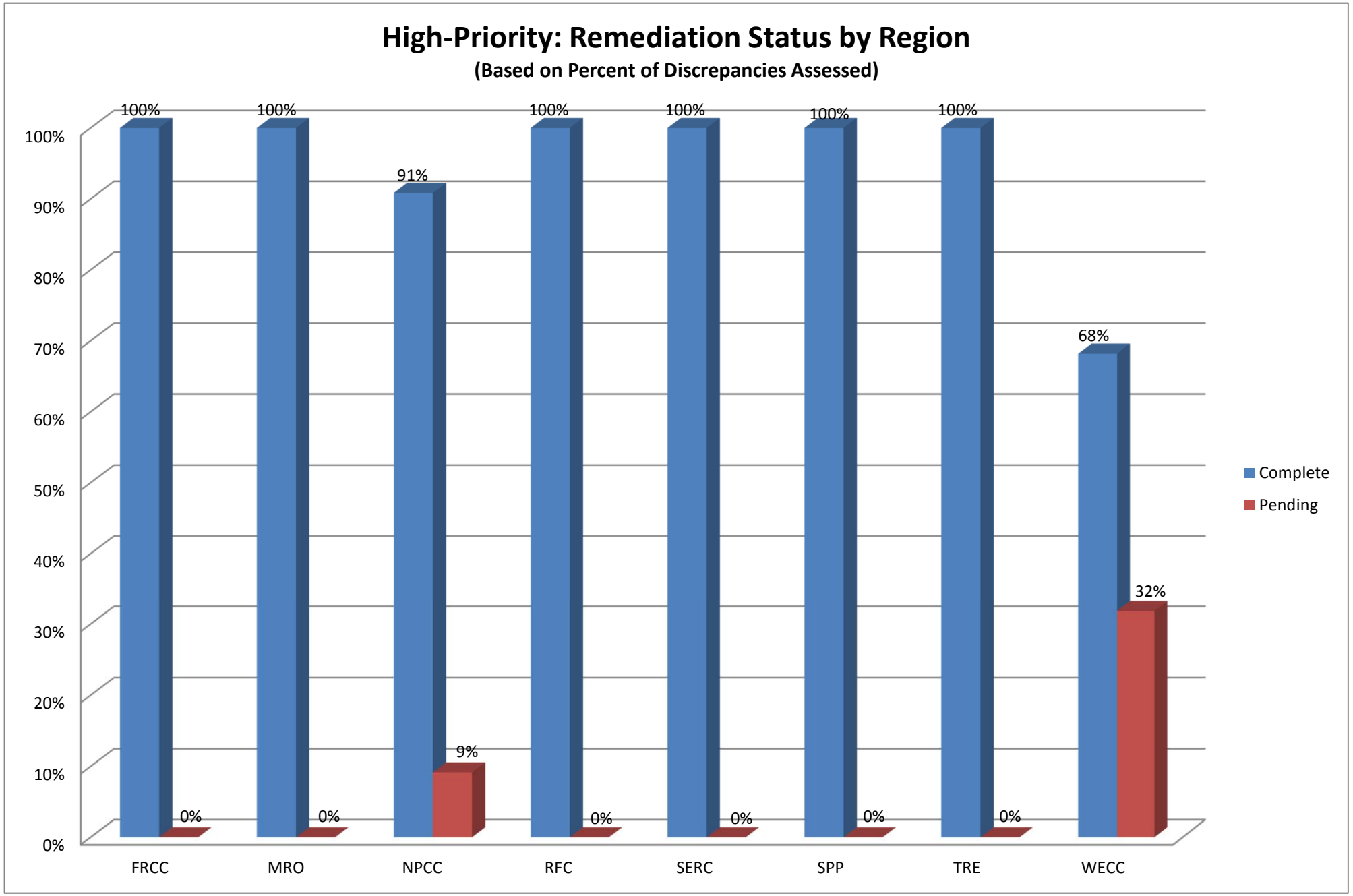
Discrepancies remediated	**74%**
Total circuits remediated	**83%**
Total circuits built to design	**94.0%**

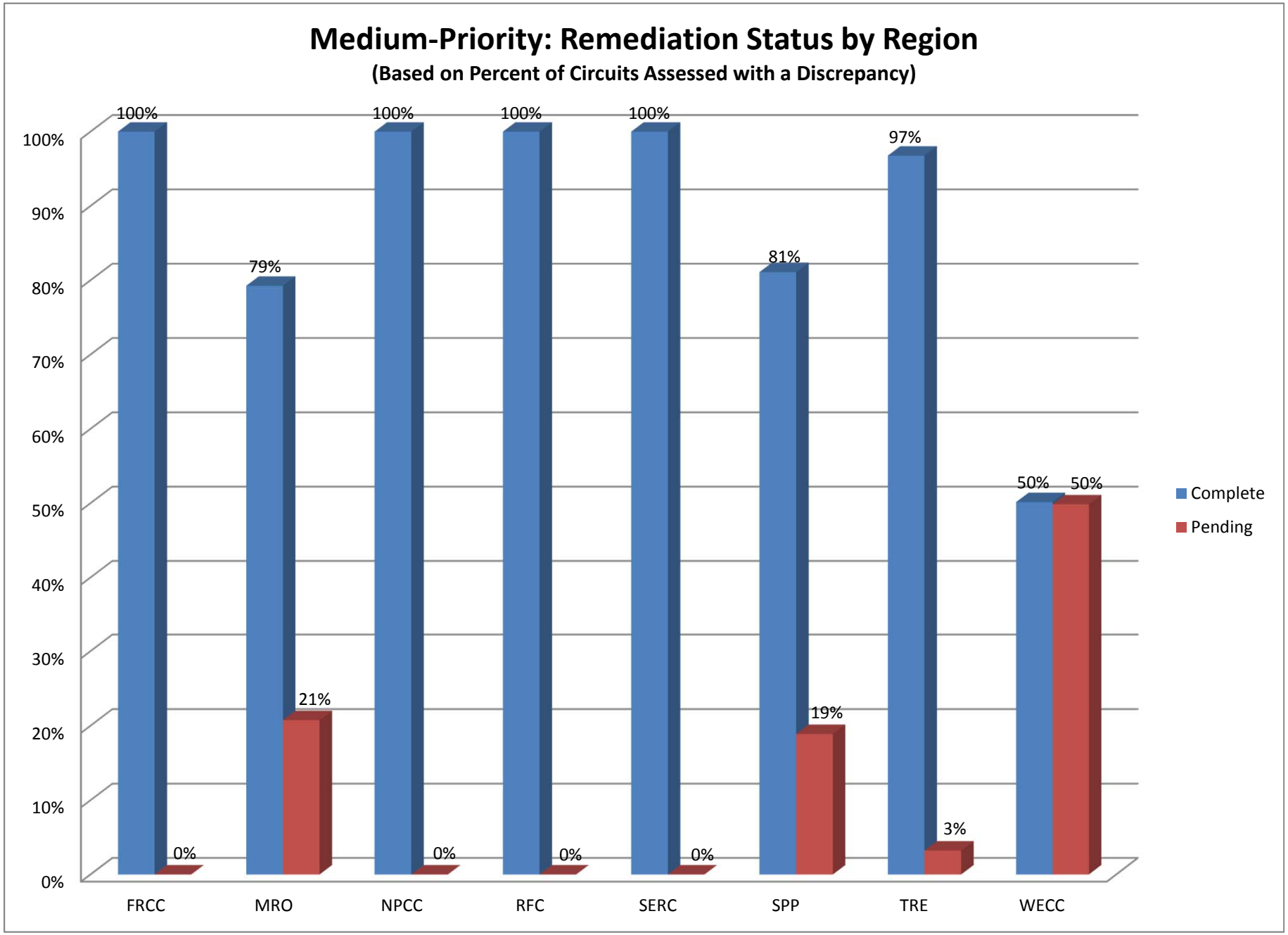
Low Priority

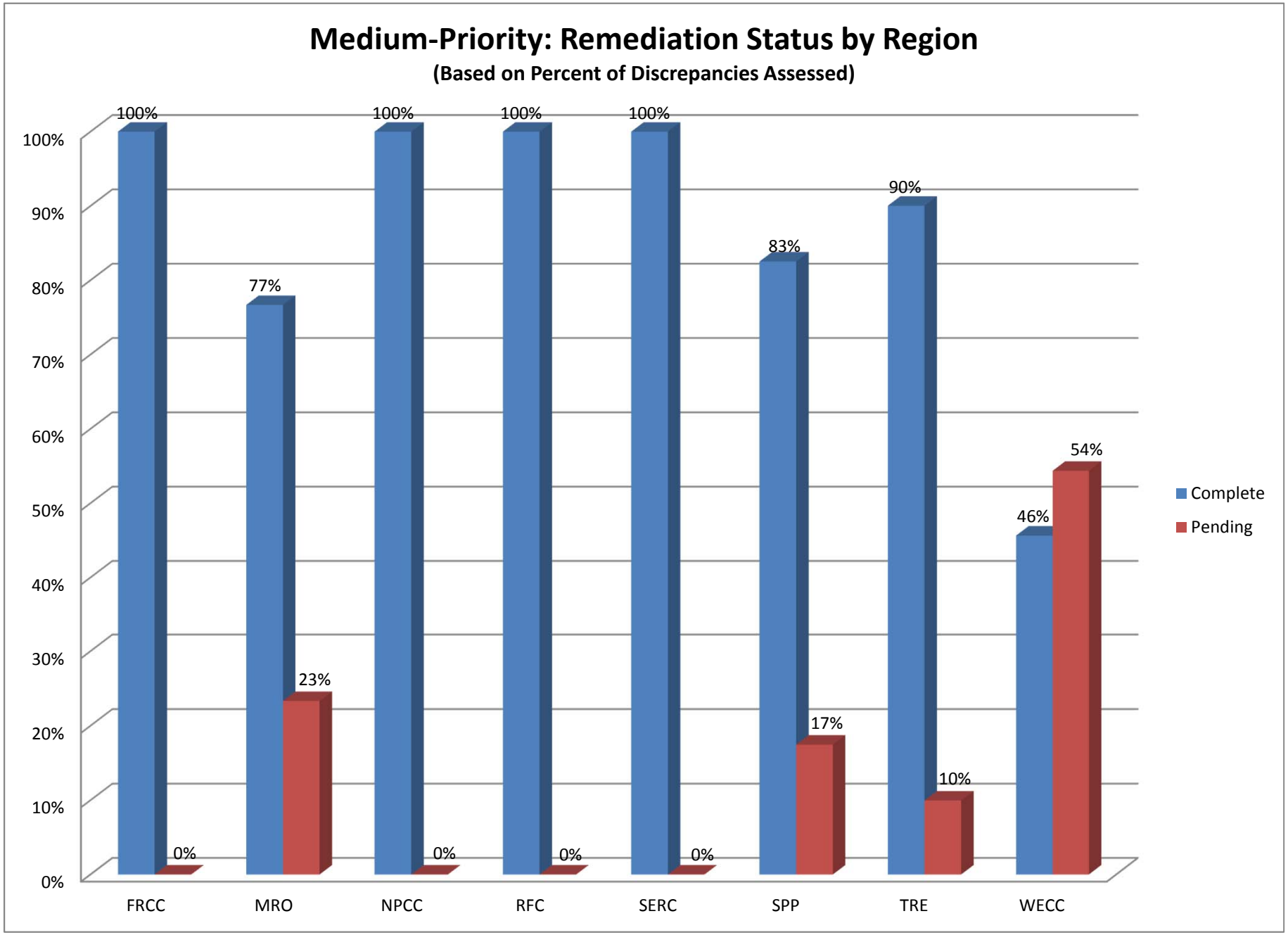
Region	Total Lines	Lines w/Discrepancies			Discrepancies		
		Total	Complete	In Progress	Total	Complete	In Progress
FRCC	611	278	226	52	2467	2343	124
MRO	1276	300	112	188	4702	2026	2676
NPCC	72	16	14	2	91	83	8
RFC	2365	373	185	188	2869	1711	1158
SERC	2879	279	182	97	1066	894	172
SPP	1099	412	115	297	3576	2369	1207
TRE	976	80	52	28	603	407	196
WECC	2107	841	301	540	8956	2048	6908
NERC total	11385	2579	1187	1392	24330	11881	12449

Discrepancies remediated	**49%**
Total circuits remediated	**46%**
Total circuits built to design	**87.8%**


High-Priority: Remediation Status by Region
(Based on Percent of Circuits Assessed with a Discrepancy)
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
100%
100%
90%
100%
100%
100%
100%
80%
0%
0%
10%
0%
0%
0%
0%
20%
FRCC
MRO
NPCC
RFC
SERC
SPP
TRE
WECC
Complete
Pending


High-Priority: Remediation Status by Region
(Based on Percent of Discrepancies Assessed)
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
100%
100%
91%
100%
100%
100%
100%
68%
0%
0%
9%
0%
0%
0%
0%
32%
FRCC
MRO
NPCC
RFC
SERC
SPP
TRE
WECC
Complete
Pending


Medium-Priority: Remediation Status by Region
(Based on Percent of Circuits Assessed with a Discrepancy)
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
100%
0%
79%
21%
100%
0%
100%
0%
100%
0%
81%
19%
97%
3%
50%
50%
FRCC
MRO
NPCC
RFC
SERC
SPP
TRE
WECC
Complete
Pending


Medium-Priority: Remediation Status by Region
(Based on Percent of Discrepancies Assessed)
100%
90%
80%
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60%
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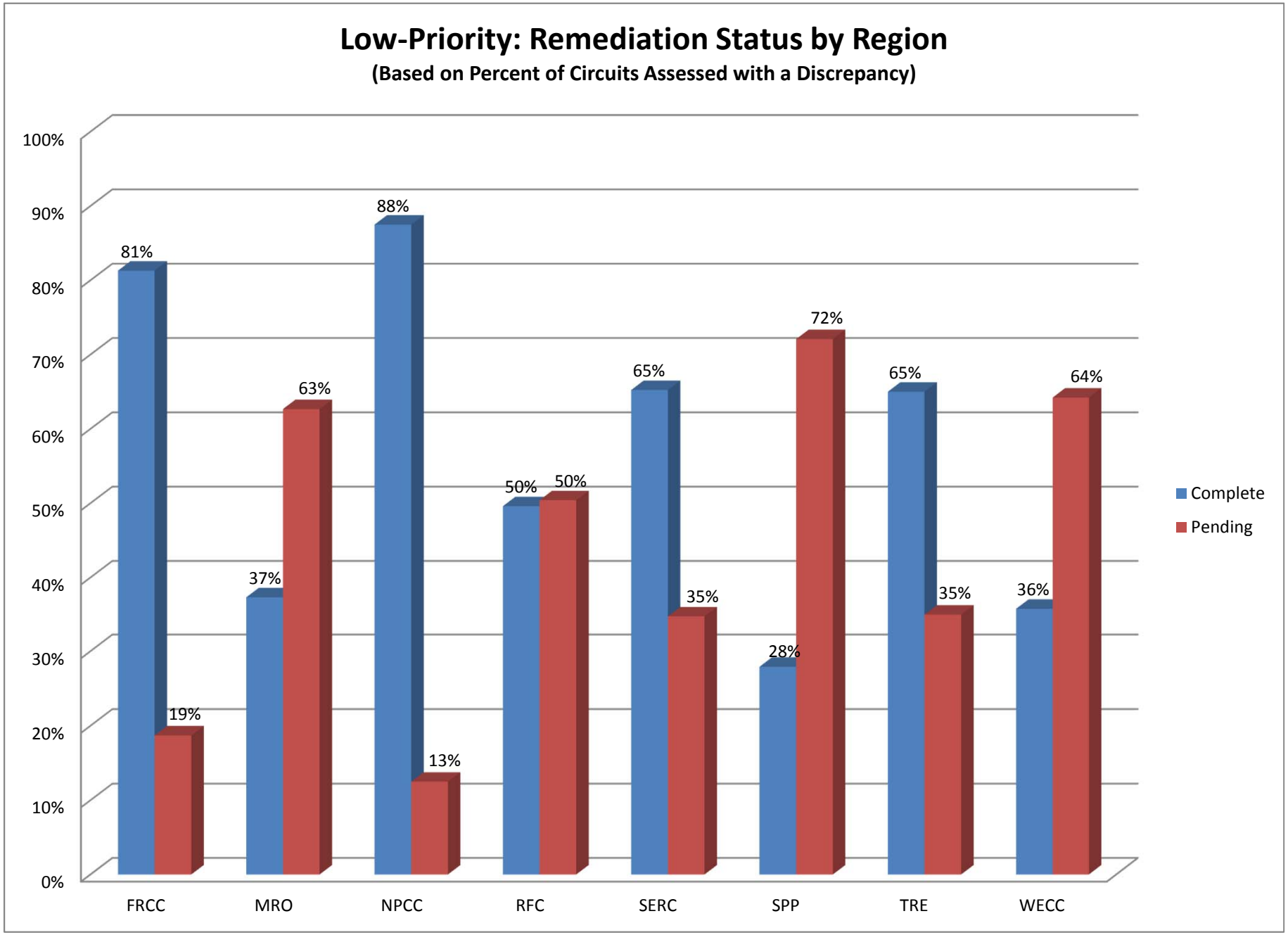
30%
20%
10%
0%
100%
0%
77%
23%
100%
0%
100%
0%
100%
0%
83%
17%
90%
10%
46%
54%
FRCC
MRO
NPCC
RFC
SERC
SPP
TRE
WECC
Complete
Pending


Low-Priority: Remediation Status by Region
(Based on Percent of Circuits Assessed with a Discrepancy)
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
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19%
37%
63%
88%
13%
50%
50%
65%
35%
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72%
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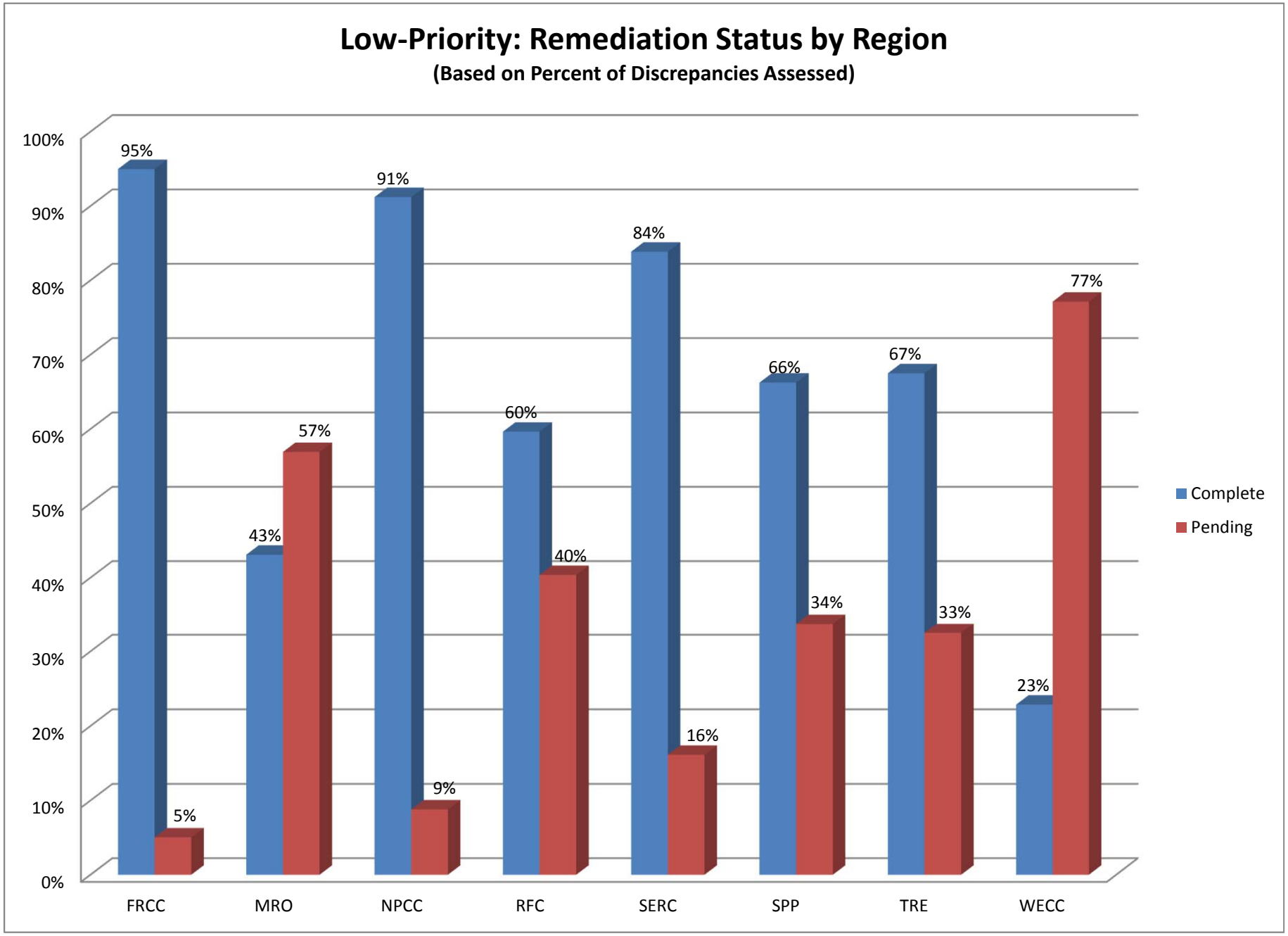
36%
64%
FRCC
MRO
NPCC
RFC
SERC
SPP
TRE
WECC
Complete
Pending


Low-Priority: Remediation Status by Region
(Based on Percent of Discrepancies Assessed)
100%
90%
80%
70%
60%
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20%
10%
0%
95%
5%
43%
57%
91%
9%
60%
40%
84%
16%
66%
34%
67%
33%
23%
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FRCC
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RFC
SERC
SPP
TRE
WECC
Complete
Pending