

March 11, 2016

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 2016.

January 2016 Update on High, Medium and Low Priority Transmission Lines

The January 2016 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 89 percent and for circuits completed is 94 percent. Given that 3,646 high priority facilities have been assessed during the course of the FAC Recommendation, 98.7 percent of all high priority transmission lines have as-built field conditions consistent with their design.

2. Medium Priority Transmission Lines

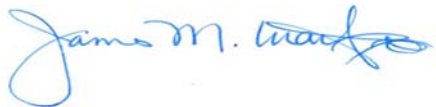
Seven of the eight Regions have completed 100 percent of their medium priority transmission facilities. The percent remediation totals across all Regions for discrepancies completed is 86 percent and for circuits completed is 91 percent. Given that 6,514 medium priority facilities have been assessed during the course of the FAC Recommendation, 96.8 percent of all medium priority transmission lines have as-built field conditions consistent with their design.

3. Low Priority Transmission Lines

Seven of the eight Regions have on-going remediation activities for their low priority transmission facilities. The percent remediation totals across all Regions for discrepancies completed is 53 percent and for circuits completed is 63 percent. Given that 11,385 low priority facilities have been assessed during the course of the FAC Recommendation, 90.5 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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Attachment 1

FAC Recommendation: Remediation Status Data - January 2016

FAC Recommendation: Remediation Status Data - January 2016 Update

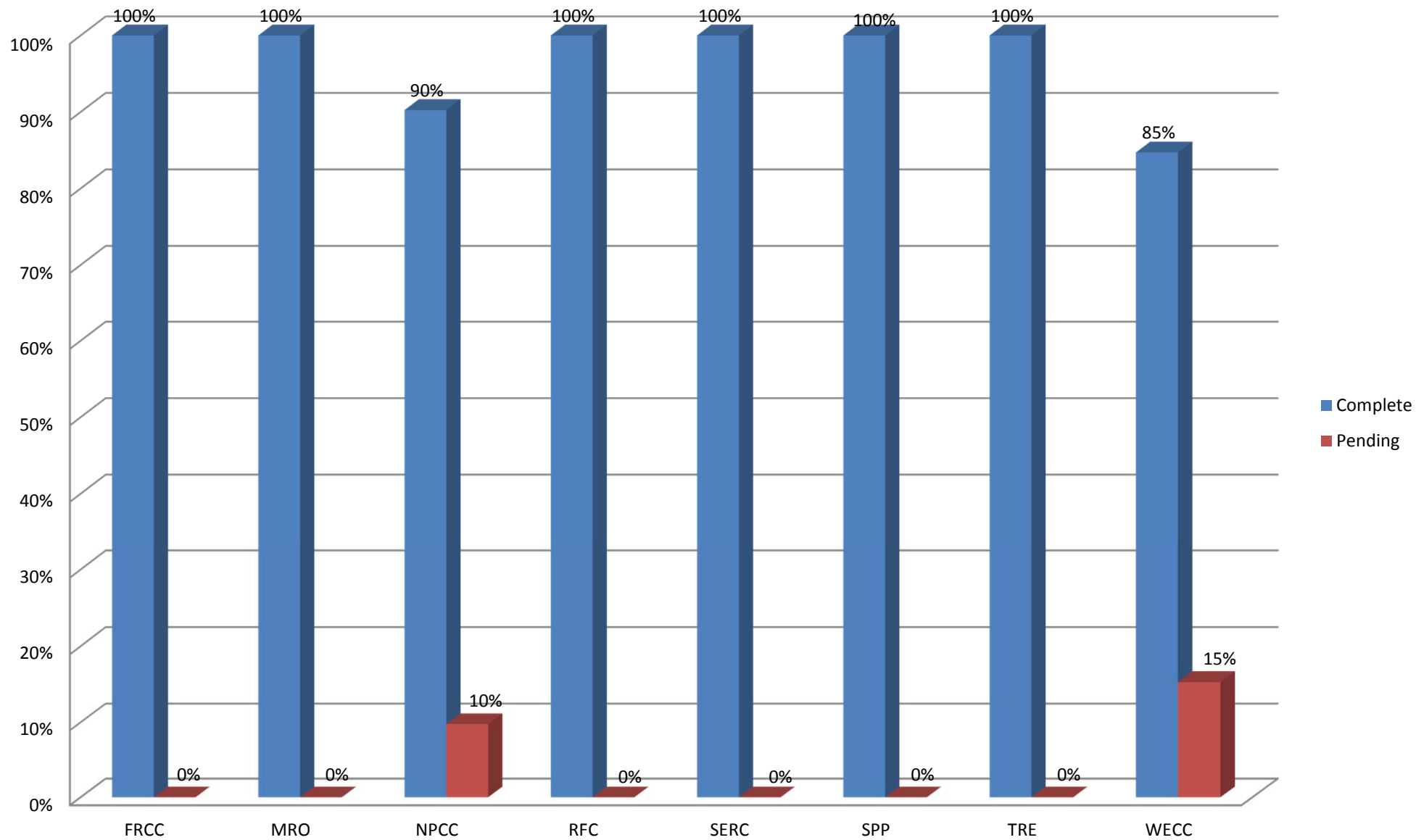
High Priority									
Region	Total Lines	Lines w/Discrepancies			Discrepancies			Discrepancies remediated	89%
		Total	Complete	In Progress	Total	Complete	In Progress	Total circuits remediated	94%
FRCC	388	90	90	0	1140	1140	0	Total circuits built to design	98.7%
MRO	315	103	103	0	1407	1407	0		
NPCC	289	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	268	227	41	3193	2329	864		
NERC total	3646	876	827	49	8092	7176	916		

Medium Priority									
Region	Total Lines	Lines w/Discrepancies			Discrepancies			Discrepancies remediated	86%
		Total	Complete	In Progress	Total	Complete	In Progress	Total circuits remediated	91%
FRCC	673	297	297	0	2017	2017	0	Total circuits built to design	96.8%
MRO	408	188	188	0	2830	2830	0		
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	127	0	1963	1963	0		
TRE	839	124	124	0	291	291	0		
WECC	1550	679	468	211	8722	5628	3094		
NERC total	6514	2284	2073	211	21677	18583	3094		

Low Priority									
Region	Total Lines	Lines w/Discrepancies			Discrepancies			Discrepancies remediated	53%
		Total	Complete	In Progress	Total	Complete	In Progress	Total circuits remediated	63%
FRCC	611	278	276	2	2467	2438	29	Total circuits built to design	90.5%
MRO	1276	300	215	85	4702	3349	1353		
NPCC	72	16	14	2	91	83	8		
RFC	2365	578	293	285	2869	2343	526		
SERC	2879	279	279	0	1066	1066	0		
SPP	1099	412	279	133	3576	2563	1013		
TRE	976	80	76	4	603	542	61		
WECC	2107	971	405	566	14067	3257	10810		
NERC total	11385	2914	1837	1077	29441	15641	13800		

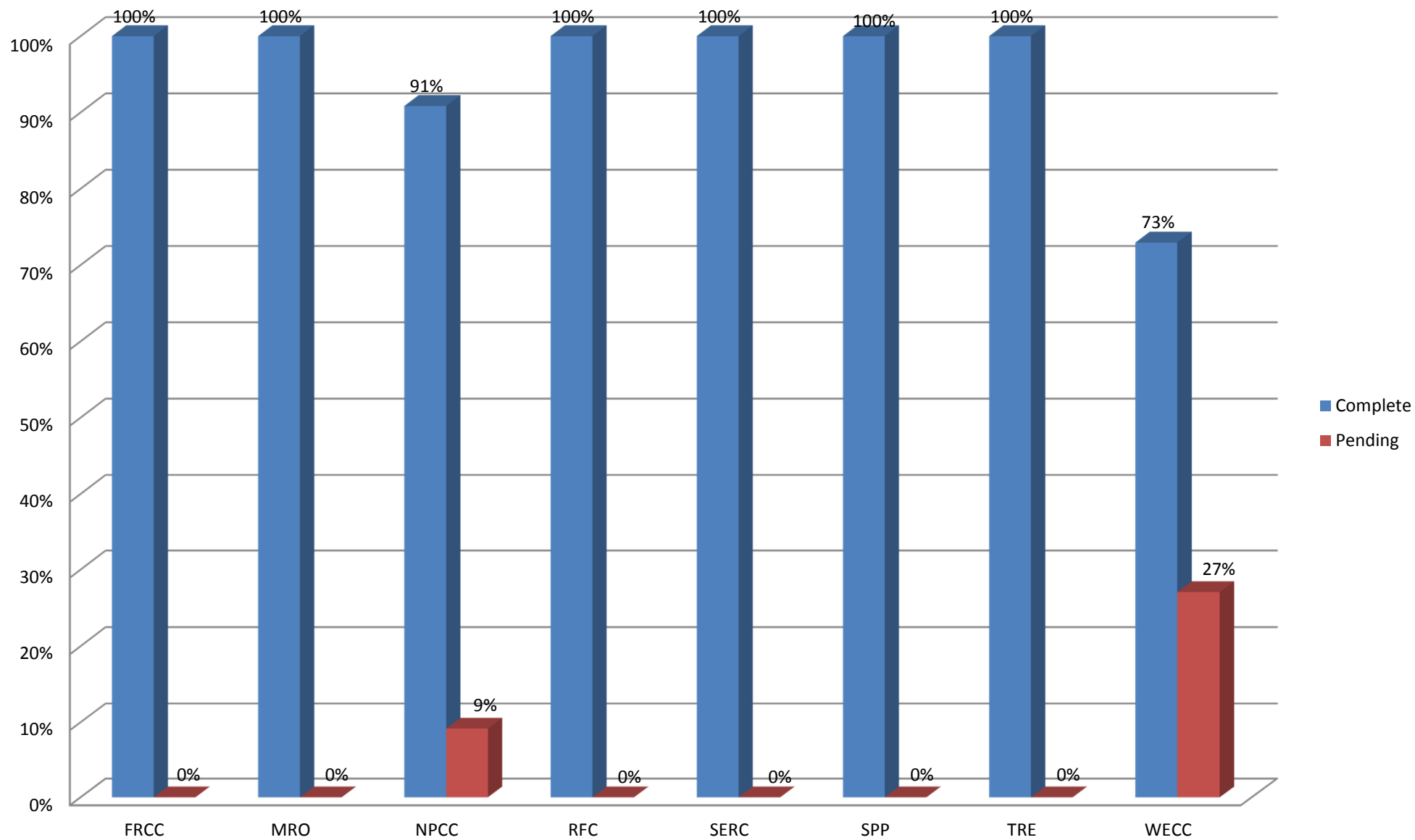
High-Priority: Remediation Status by Region

(Based on Percent of Circuits Assessed with a Discrepancy)



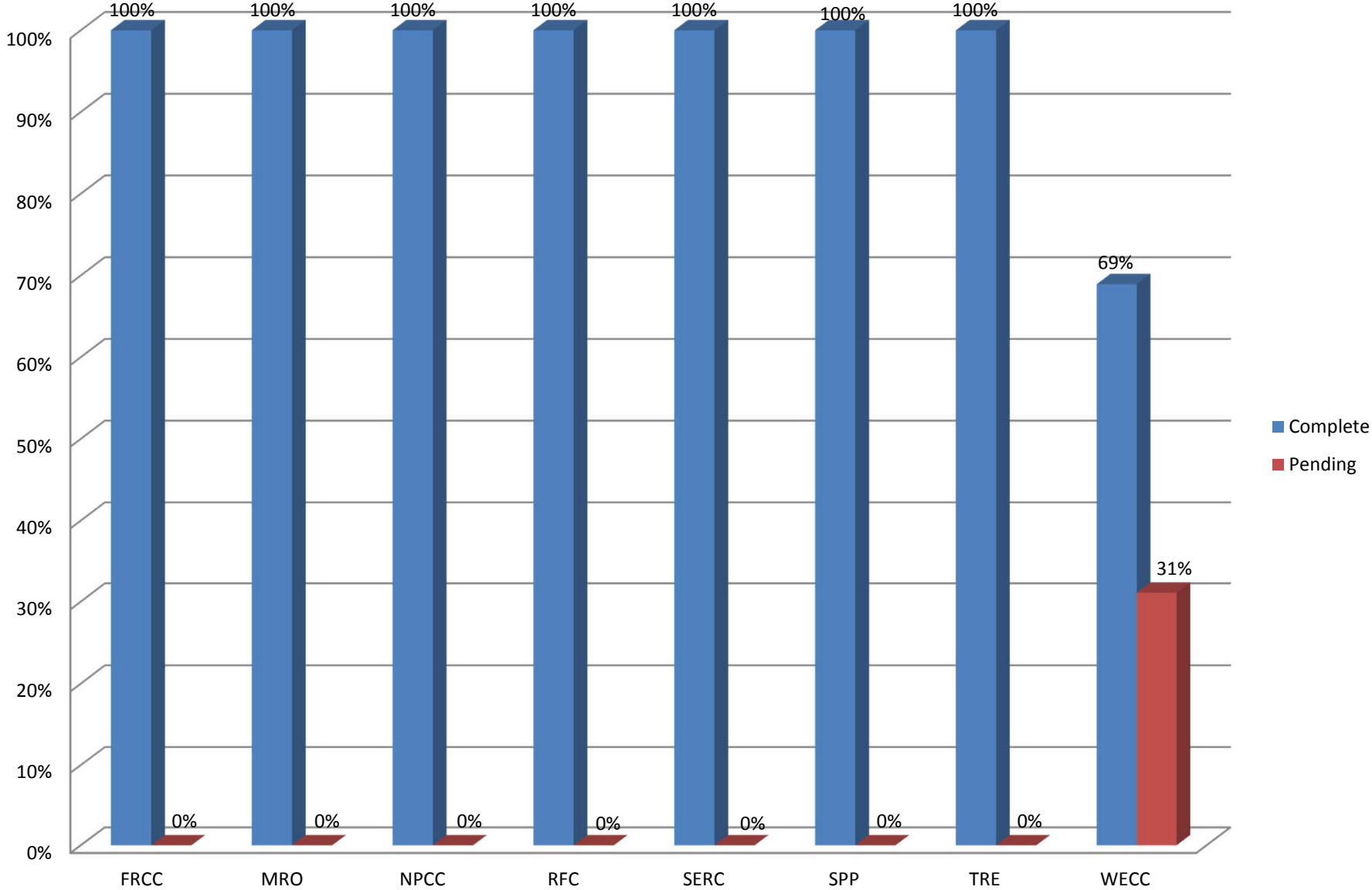
High-Priority: Remediation Status by Region

(Based on Percent of Discrepancies Assessed)



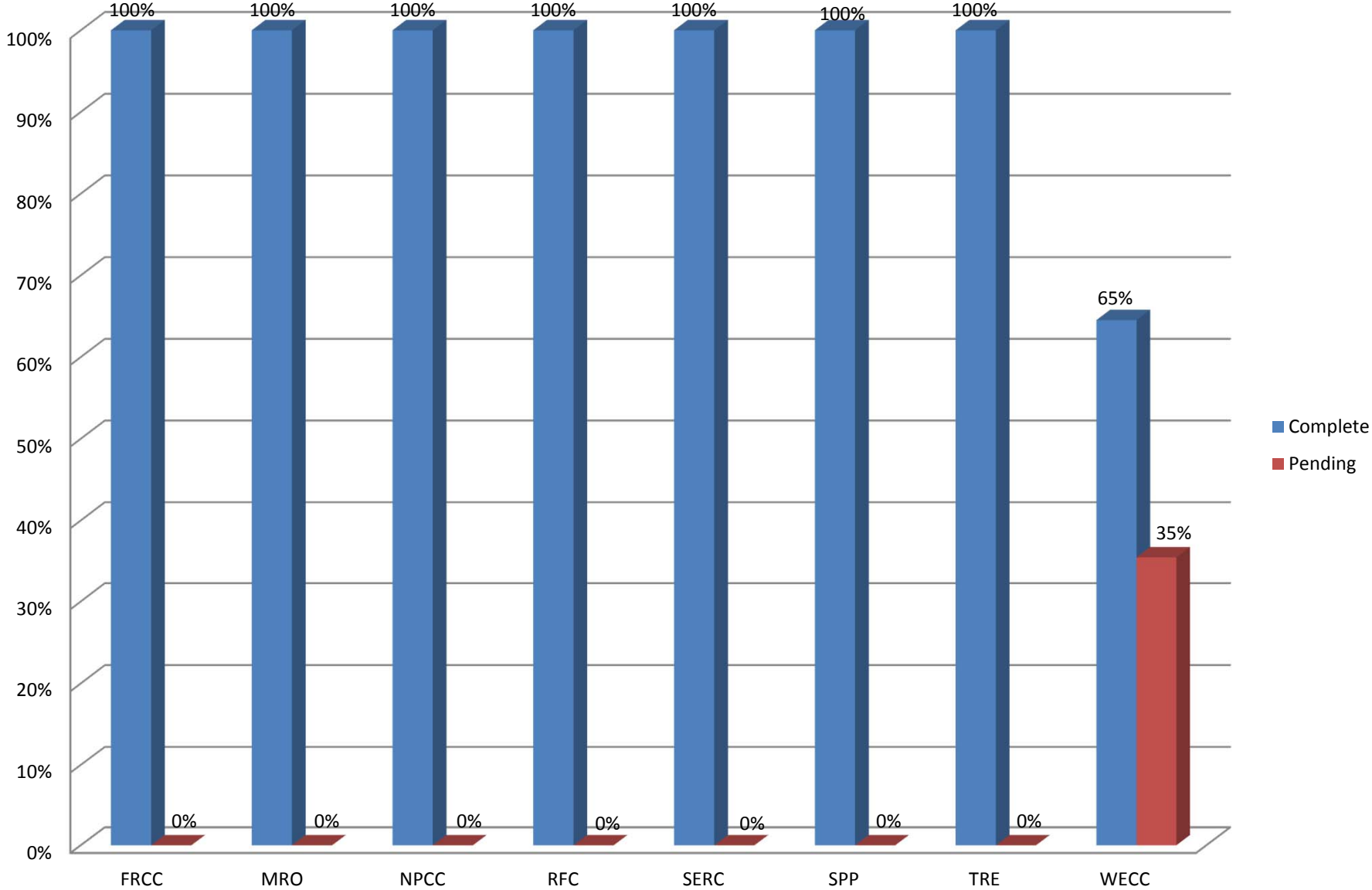
Medium-Priority: Remediation Status by Region

(Based on Percent of Circuits Assessed with a Discrepancy)



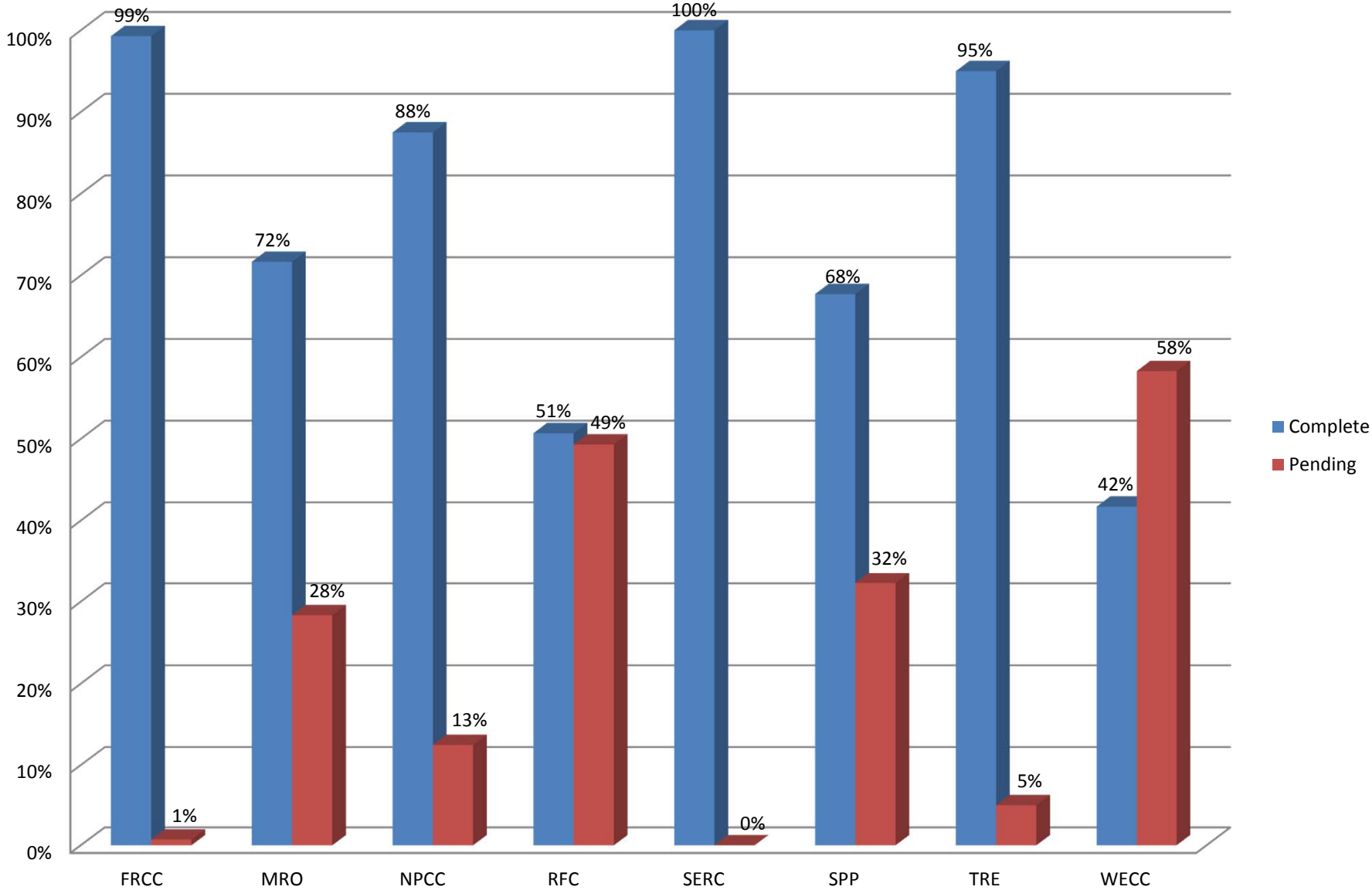
Medium-Priority: Remediation Status by Region

(Based on Percent of Discrepancies Assessed)



Low-Priority: Remediation Status by Region

(Based on Percent of Circuits Assessed with a Discrepancy)



Low-Priority: Remediation Status by Region

(Based on Percent of Discrepancies Assessed)

