Comment Form for Definition of Contingency

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**H. Steven Myers**	
Organization:	**ERCOT**	
Telephone:	**512-248-3077**	
E-mail:	**smyers@ercot.com**	
NERC Region		**Registered Ballot Body Segment**
☒ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☐	1 — Transmission Owners
	☒	2 — RTOs, ISOs, Regional Reliability Councils
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
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	☐	9 — Federal, State, Provincial Regulatory, or other Government Entities

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Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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> **Contingency:** The unexpected loss of one or more Bulk Electric System Facilities caused by a single initiating ~~event~~ failure or outage.

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Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☒ Yes

   ☐ No

   Comments: The key here is that the "initiating failure or outage" is something of unexpected nature. The SDT has discussed the intent of the language multiple times and there is no intent to change from existing meanings of common useage of the term contingency. There will always be a need to examine all failures to determine whether they were multiple contingencies. By far the majority of contingencies are common events such as a breaker trip, a line tripping out of service, or a generator tripping off line. There is no feasible way to completely describe all contingencies that could occur and summarize them in a brief definition.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**William J. Smith**	
Organization:	**Allegheny Power**	
Telephone:	**(724) 838-6552**	
E-mail:	**wsmith1@alleghenypower.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☒ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☒	1 — Transmission Owners
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Contact Segment:

Contact Telephone:

Contact E-mail:

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   ☒ Yes

   ☐ No

   Comments:

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Group Comments (Complete this page if comments are from a group.)

Group Name: **NERC Standards Evaluation Subcommittee**

Lead Contact: Bill Bojorquez

Contact Organization: ERCOT

Contact Segment:

Contact Telephone: 512-248-3036

Contact E-mail: bbojorquez@ercot.com

Additional Member Name	Additional Member Organization	Region*	Segment*

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1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☒ Yes

   ☐ No

   Comments: The SES supports this revised definition with the provision that the SDT has reviewed all previously adopted Version 0 standards and has determined that new definitions for Contingency and Bulk Electric System Facilities will require no additional revisions or modifications to any Version 0 Reliabiltiy Standards already approved and adopted.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Alan Gale**	
Organization:	**City of Tallahassee (TAL)**	
Telephone:	**(850) 891-3025**	
E-mail:	**galea@talgov.com**	
NERC Region		**Registered Ballot Body Segment**
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Contact Segment:

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Contact E-mail:

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1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments:

   In the responses to vote comments, the Drafting Team wrote; "During the development of this standard, the drafting team asked stakeholders to consider whether credible multiple contingencies should be addressed in FAC-010. From comments, it was clear that the minimal standard for evaluation of limits was a consideration of only first contingencies."

   The proposed definition is still treating the results of any event as a single contingency, no matter the severity, or the number of elements removed by that event, which contradicts the Drafting Teams statement. It is clear by the response to the vote comments that this is not the drafting team's intent, nor is it the desire of the industry.

   The proposed definition is not "clear and unambiguous". It is muddying up the waters. I agree that a contingency is "the unexpected loss", but it is not "one or more", it is only one.

   Table 1 of TPL-002 and TPL-003 refer to Category C and D "events" resulting in the loss of more than 1 element. These are commonly referred to as "multiple contingency events". They are also refered to as such in R4.5.

   This view is further supported by the way it is used in R4.2, R4.3 and R4.5.

   I believe it is necessary to treat the results of the contingency separate from the cause of the contingency.

   To more accurately reflect the current use of the terminology deeply embedded in the industry I propose the following definitions:

   CONTINGENCY - The unexpected failure or outage of a single system component, such as a generator, transmission line, circuit breaker, switch, or other element.

   EVENT - The sequence of system response and/or outages caused by one or more CONTINGENCIES.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**John Horakh_01-10-2006**	
Organization:	**MAAC**	
Telephone:	**609-625-6014**	
E-mail:	**john.horakh@pepcoholdings.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☒ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☐	1 — Transmission Owners
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Contact Telephone:

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1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: What I don't like about the changed definition:

   UNEXPECTED - A contingency need not be unexpected, an occasional fault should be expected

   LOSS - The loss of a facility is not the contingency, the initiating event is. -- also -- A loss sounds like the permanent destruction of a facility

   SINGLE - A contingency may be two or more related events

   OUTAGE - An outage is not an initiating event, it is the result of an initiating event.

   Here's my suggested definition, totally reworded:

   Contingency: An initiating fault, failure , unplanned event or device operation, or a combination thereof, causing the outage of one or more Bulk Electric System Facilities.

   I believe this definition is more logical and that it fits in with Standards TPL-002-0, TPL-003-0, TPL-004-0 and the included Table I for each.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**James K. Robinson**	
Organization:	**PPL Electric Utilities**	
Telephone:	**610-597-7994**	
E-mail:	**JKRobinson@pplweb.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☒ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☒	1 — Transmission Owners
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Lead Contact:

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   ☐ Yes

   ☒ No

   Comments: A new item should be added to paragraph R4.2

   "R4.2.4 For a stability limited system condition, a single line to ground fault plus a failure of a single component, which is challenged to operate, should not lead to cascading of system elements." Examples of "a failure of single component, which is challenged to operate, " would include but not be limited to 1) a stuck circuit breaker, or 2) failure of a high speed protective relay, which when challenged fails to operate properly.

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Group Comments (Complete this page if comments are from a group.)

Group Name: **SERC EC Planning Standards Subcommittee (PSS)**

Lead Contact: Kham Vongkhamchanh

Contact Organization: Entergy Services, Inc.

Contact Segment: 1

Contact Telephone: (601) 339-2561

Contact E-mail: kvongkh@entergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Darrell Pace	Alabama Electric Cooperative	SERC	1
Clay Young	South Carolina Electric & Gas Co	SERC	3
Art Brown	SCPSA (Santee Cooper)	SERC	1
Pat Huntley	SERC	SERC	2
Bob Jones	Southern Company Services	SERC	1
Travis Sykes	TVA	SERC	1
Brian Moss	Duke Power Co.	SERC	1

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1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: The SERC PSS votes no due to our concern that the proposed definition of the term [contingency] is not consistent with the intended use of the term in these and other standards. For example, the use of the term in R4.2 of FAC-010-1 appears to be more in line with the original Version 0 definition.

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Group Comments (Complete this page if comments are from a group.)

Group Name: **CP9 Reliability Standards Working Group**

Lead Contact: Guy V. Zito

Contact Organization: Northeast Power Coordinating Council

Contact Segment: 2

Contact Telephone: 212-840-1070

Contact E-mail: gzito@npcc.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Ralph Rufrano	New York Power Authority	NPCC	2
Kathleen Goodman	ISO-New England	NPCC	2
David Little	Nova Scotia Power	NPCC	1
Alden Briggs	New Brunswick ISO	NPCC	2
Peter Lebro	National Grid	NPCC	1
David Kiguel	Hydro One Networks	NPCC	1
Bill Shemley	ISO-New England	NPCC	2
Jerry Mosier	Northeast Power Cor. Council	NPCC	2
Guy V. Zito	Northeast Power Cor. Council	NPCC	2
Brian Hogue	Northeast Power Cor. Council	NPCC	2
Roger Champagne	TransEnergie Hydro-Quebec	NPCC	1

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1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: NPCC participating members prefer the approved Version 0 definition that appears in the approved and posted NERC Glossary of Terms which corresponds to the N-1 Criterion. The definition is as follows;

   The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element.

   Change of the definition during the development of a Reliability Standard without reviewing other standards for consistency is potentially problematic.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Alan Adamson**	
Organization:	**New York State Reliability Council (NYSRC)**	
Telephone:	**518-355-1937**	
E-mail:	**aadamson@nycap.rr.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☐	1 — Transmission Owners
	☒	2 — RTOs, ISOs, Regional Reliability Councils
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background:
During the first ballot and re-ballot of FAC-010 - System Operating Limits Methodology and FAC-011 - Establish and Communicate System Operating Limits, stakeholders indicated that the definition of contingency could have multiple interpretations, and asked the drafting team to modify the definition to clarify the intent. The drafting team modified the definition as follows:

> **Contingency:** The unexpected loss of one or more Bulk Electric System Facilities caused by a single initiating ~~event~~ failure or outage.

Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: The New York State Reliability Council (NYSRC) does not agree with the proposed modification of the definition of the term "contingency." Contingencies on the bulk electric power system are not necessarily caused by a "failure or outage." Also, the "unexpected loss of one or more Bulk Electric Facilities" IS a failure or outage; therefore, the proposed definition defines a contingency as "an outage caused by an outage". For this reason the NYSRC prefers the definition as originally drafted prior to the first ballot, as follows: "The unexpected loss of one or more Bulk Electric System Facilities caused by a single initating event."

   Further, the NYSRC remains concerned that the required methodology for determining System Operating Limits (SOLs) in Draft #6 of FAC-010-1 continues to omit the requirement to consider credible multiple element contingencies. This concern was addressed in our comments on earlier drafts and during the balloting of this standard. The NYSRC does not believe that the Drafting Team satisfactorily responded to these comments and is disappointed that they were not considered in this new draft.

   The NYSRC believes that the proposed standard is not consistent with a critical recommendation in the Final Report on the August 14, 2003 Blackout in the United States and Canada, prepared by the U.S.-Canada Power System Outage Task Force. Recommendation #25 states that the NERC process to reevaluate its standards should "not dilute the content of the existing standards." The report's support for this recommendation uses a quote from a commenter on the Interim Report as follows: "A strong transmission system designed and operated in accordance with weakened criteria would be disastrous. Instead, a concerted effort should be undertaken to determine if existing reliability criteria should be strengthened…Only through strong standards and careful engineering can unacceptable power failures like August 14, 2003 be avoided in the future." Standard FAC-010-1, because it does not require consideration of credible multiple element contingencies, does not meet this principle, for the following reasons:

1. Section R2 of proposed standard FAC-010-1 states that the standard's required methodology "shall be applicable to development of SOLs during the planning horizon". However, the recently adopted Version 0 transmission system planning standard TPL-003-0, "System Performance Following Loss of Two or More BES Elements", includes a requirement to assess so-called Category C contingencies, i.e., events resulting in the loss of two or more (multiple) elements. Therefore, adoption of FAC-010-1 in its present form, without considering Category C contingencies, would be inconsistent with Standard TPL-003-0 and would thus result in a weakening of existing NERC standards.

2. Category C contingencies should be applied to the operation of the bulk electric system, as well as to planning. The Drafting Team contended in its response to this concern that "the typical operating condition is to have one or more facilities out of service." We agree that frequently during the operation of the system one or more facilities are out of service, and as a result inclusion of Category C contingency criteria may at times result in overly stringent restrictions. Under such conditions, evaluation of Category C contingencies would not be warranted, and an exception to meeting this requirement would then be permitted. However, evaluation of Category C contingencies should be required for all other operating conditions.

3. NYSRC agrees that Category C contingencies need not be applied when key transmission elements are already out of service. Traditionally, NPCC members and many other systems have used "normal operating criteria," which include Category C contingencies, for determining SOLs when all key transmission elements are in service. When one or more key transmission elements are out of service, "emergency operating criteria," which do not include Category C (multi-element) contingencies, would be used. Since the latter condition would normally apply for only a small percentage of the total hours of the year, Category C (multi-element) contingencies would and should be used for determining SOLs most of the time. The same philosophy would be used in the case of serious resource inadequacy.

4. Another reason for requiring Category C contingencies to apply to operations is that a system designed to these criteria should also be operated to it. It makes no sense to invest in and construct a transmission system based on Category C requirements in accordance with NERC transmission system planning standard TPL-003-0, and then operate the same system using weaker criteria as proposed in Standard FAC-010-1.

5. We recognize that the SDT has included a provision in section R4.4 that allows a Region to establish criteria requiring consideration of credible multiple element contingencies. However, we believe that reliability standards recognizing this class of contingencies should be maintained in all of North America, not only certain Regions. A weakening of reliability standards in any Region could adversely affect the reliability in another Region, even if the other Region has adopted more stringent standards.

In conclusion, the NYSRC continues to strongly believe that adoption of proposed standard FAC-010-1, as proposed in Draft #6, would weaken present NERC criteria, and in light of 2003 Blackout lessons-learned, would result in an unacceptable reliability impact for the North American bulk electric system.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Kathleen A. Davis**	
Organization:	**Tennessee Valley Authority**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☒ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☒	1 — Transmission Owners
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Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*
Al Corbet	TVA	SERC	1

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> **Contingency:** The unexpected loss of one or more Bulk Electric System Facilities caused by a single initiating ~~event~~ failure or outage.

Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☒ Yes

   ☐ No

   Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Kathleen Goodman**	
Organization:	**ISO New England**	
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E-mail:	**kgoodman@iso-ne.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☐	1 — Transmission Owners
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Additional Member Name	Additional Member Organization	Region*	Segment*
			2

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1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: ISO-NE prefers the approved Version 0 definition that appears in the approved and posted NERC Glossary of Terms which corresponds to the N-1 Criterion. The definition is:

   "The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element."

   Change of the definition during the development of a Reliability Standard without reviewing other standards for consistency is potentially problematic.

   Additionally, a revision to the definition 'contingency' only, fails to fully capture concerns previously raised with this standard; specifically it does not require consideration of credible multiple element contingencies as previously commented by the industry.

   We recognize that the Standards Drafting Team has included a provision in section R4.5 which permits a Region to establish criteria requiring consideration of credible multiple element contingencies. However, we believe that reliability standards recognizing this class of contingencies should be maintained in all of North America, not only certain Regions. A weakening of reliability standards in any Region could adversely affect the reliability in another Region, even if the other Region has adopted more stringent standards.

   We thank the standards drafting team for their efforts and commend the team for their work in developing this standard.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Ron Falsetti**	
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Telephone:	**905 855-6187**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☐	1 — Transmission Owners
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> **Contingency:** The unexpected loss of one or more Bulk Electric System Facilities caused by a single initiating ~~event~~ failure or outage.

Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: (1) Change of the definition during the development of a Reliability Standard without reviewing other standards for consistency is potentially problematic. The IESO nevertheless proposes the following definition to eliminate concerns raised regarding single or multiple initiating events, if it is to change.

   "Contingency: An unexpected event, which could result in the loss of one or more Bulk Electric System facilities."

   It is also the IESO's view a revision to the definition 'contingency' only, fails to fully capture concerns previously raised with this standard; specifically:

   2). While, we recognize that the Standards Drafting Team has included a provision in section R4.5 which permits a Region to establish criteria requiring consideration of credible multiple element contingencies. We continue to believe that reliability standards recognizing this class of contingencies should be maintained in all of North America, not only certain Regions. A weakening of reliability standards in any Region could adversely affect the reliability in another Region, even if the other Region has adopted more stringent standards.

   We further believe it is inconsistent with a critical recommendation of the joint U.S.-Canada Power System Outage Task Force in its Final Report of the August 14, 2003 Blackout. Specifically, recommendation #25 which states that the NERC process to re-evaluate its standards should "not dilute the content of the existing standards. Standard FAC-010-1, in our view fails to meet this principle since it does not require consideration of credible multiple element contingencies. It is also in this context that we believe inconsistencies exist between FAC-010-1 and the existing Transmission Planning (TPL) series of standards, resulting in confusion in the industry.

   R2 of proposed standard FAC-010-1 states that the standard's required methodology "shall be applicable to development of SOLs during the planning horizon". However, the recently adopted transmission system planning standard TPL-003-0, "System Performance Following Loss of Two or More BES Elements", includes a requirement to assess Category C contingencies as listed in Table 1, i.e., events resulting in the loss of two or more (multiple) elements. Therefore, adoption of FAC-010-1 in its present form,

without considering Category C contingencies, would be inconsistent with Standard TPL-003-0 and would thus result in a weakening of existing NERC standards.

3) Additionally, standard FAC-010-1, requirement R4.2.2 is not totally consistent with standard TPL-002-0. TPL-002-0 requires that category "B" contingencies as listed in Table1 be observed. Table 1 of the standard includes requirements stated in FAC-010-1 R4.2.2 and 4.2.3, but also includes the "Loss of an Element without a Fault", as a requirement to be met. FAC-010-1 as currently written would appear to exclude the loss of any single bus or an inadvertent breaker opening. Either of these are single contingencies that can remove additional BES facilities or reconfigure the BES to the point where the BES could be in a cascading situation. It needs to be clarified whether the exclusion of a single bus or an inadvertent breaker operation is deliberate from Requirement R4.2.2. If not, Requirement R4.2.2 should include the missing categories specified in the "element" definition, or make reference to the TPL-002 standard, Table 1. We prefer to have reference to the TPL standard, which will eliminate the need to revise this standard should the other standard changes.

[R4.2 states: "Following the single Contingencies identified in Reliability Standard FAC-010- 1_R4.2.1 through R4.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their thermal, voltage and stability limits; and Cascading Outages or uncontrolled separation shall not occur"]. It excludes provision for respecting all the applicable ratings as stipulated in Table 1 of TPL-002-0

IESO Recommendations:

1). It needs to be clarified whether the exclusion of a single bus or an inadvertent breaker is deliberate from Requirement R4.2.2 and if so why?

2). We believe that we understand and agree with the goals of requirement R4.2, but do not support the requirement as stated. It currently states that “Following contingencies… all facilities shall be operating within their facility ratings and within their thermal, voltage and stability limits.” It is impractical to expect to be operating within all limits immediately following a contingency.

Assuming the goal is to clarify the standard we propose the following revised wording.

R4.2 "Following the single Contingencies identified in FAC-010 Requirement 4.2.1 through Requirement 4.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their applicable Normal and Emergency thermal ratings, voltage and stability limits within the applicable re-preparation time (Interconnection Reliability Operating Limit Tv (IROL Tv); and Cascading Outages or uncontrolled separation shall not occur."

3). We further suggest that, in order to be consistent with standard TPL-003, “Category C” contingencies be included in standard FAC-010-1 SOL methodology for use in developing SOL’s,

While we recognize that the SDT has included a provision in section R4.5 which permits a Region to establish criteria requiring consideration of credible multiple element contingencies. However, we believe that reliability standards recognizing this class of

contingencies should be maintained in all of North America, not only certain Regions. A weakening of reliability standards in any Region could adversely affect the reliability in another Region, even if the other Region has adopted more stringent standards.

We thank the standards drafting team for their efforts and commend the team for their word in developing this standard.

The IESO appreciates the opportunity to table these comments and looks forward to participating further in the standards development process.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**John E. Sullivan**	
Organization:	**Ameren**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☒	1 — Transmission Owners
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   ☒ Yes

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Peter Burke [on behalf of ATC's Planning and Operations Departments]**	
Organization:	**American Transmission Company LLC ATC**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☒ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☒	1 — Transmission Owners
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1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: ATC commends the DFRDT on their continuing efforts to clarify FAC-010-1 and FAC-011-1. ATC endorses the comments submitted by the MRO, which are as follows:

   The MRO notes that contingency is currently defined in the existing NERC Glossary of Terms Used in Reliablity Standards (NERC Glossary) as the unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element. The word contingency appears 103 times in current NERC Reliability Standards including 14 times in defining other NERC terms in the existing NERC Glossary. A change requires a careful examination of the use of the word contingency in all these other NERC standards.

   Also, the MRO notes that the proposed definition is not necessarily consistent with the requirements in the standards. For example, Requirement 4.2 of FAC-010-1 requires that checking for single contingencies consisting of faults or outages that cause the loss of single electric elements. Are faults assumed to be equivalent to failures?

   The MRO believes that the definition contingency does not need to refer to the event causing the contingencies but rather the event itself, namely "the unexpected failure or outage of a system component" as provided in the current definition of contingency included in the NERC Glossary.

   Further, the proposed definition requires that single events which cause one or more element outages is a single contingency. This would say that potentially a single contingency could even be five outages that are caused by a single "failure or outage." This is not consistent with the way in which Bulk Electric Systems in NERC have been planned or operated historically.

   Therefore, the MRO recommends that the DFRDT leave the definition for contingency unchanged from the current definition in the NERC Glossary.

   The MRO does not support the revised definition as well as the original definition offered in the proposed FAC-010-1.

Comment Form for Definition of Contingency

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Murale Gopinathan**	
Organization:	**Northeast Utilities**	
Telephone:	**(860)665-6896**	
E-mail:	**gopinm@nu.com**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☒	1 — Transmission Owners
	☐	2 — RTOs, ISOs, Regional Reliability Councils
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory, or other Government Entities

Comment Form for Definition of Contingency

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background:
During the first ballot and re-ballot of FAC-010 - System Operating Limits Methodology and FAC-011 - Establish and Communicate System Operating Limits, stakeholders indicated that the definition of contingency could have multiple interpretations, and asked the drafting team to modify the definition to clarify the intent. The drafting team modified the definition as follows:

> **Contingency:** The unexpected loss of one or more Bulk Electric System Facilities caused by a single initiating ~~event~~ failure or outage.

Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: The standard does not adequately require the Reliability Coordinator to evaluate credible multiple contingency events when determining system operating limits. Section R4.5 does not give equal weight to the regional difference that was provided to the Western Interconnection in Section E. Defining different levels of requirements based on geographical location is not conducive to the development of a national standard. As seen on August 14, 2003 adjacent areas of the country operating to different levels of reliability can lead to disastrous results. We recognize the Western Interconnection Regional Differences are similar to existing operating practices in northeastern United States and recommend these requirements be afforded to all regions who adopt multiple contingency planning and operating practices.

   The definition of Contingency shall be similar to those contained in the TPL standards.

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Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
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Group Comments (Complete this page if comments are from a group.)

Group Name: **WECC-Technical Studies Subcommittee**

Lead Contact: Chifong Thomas

Contact Organization: PG&E

Contact Segment: 1

Contact Telephone: 415-973-7646

Contact E-mail: clt7@pge.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Mariam Mirzadeh	WAPA	WECC	1
Dilip Mahendra	SMUD	WECC	1
Randall Hunt	TANC	WECC	1
Peter Mackin	TANC	WECC	1
Shamir Ladhani	ENMAX Power Corporation	WECC	1
Joe Seabrook	Puget Sound Energy	WECC	1
Dana Cabbell	Southern California Edison	WECC	1

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: The WECC Techanical Studies Subcommittee (TSS) prefers the old definition. WECC understands the term "event" could lead to the loss of an element due to electrical AND non-electrical reasons such as lightning, fires, airplanes, wind, etc. The proposed change could introduce confusion. For example, an unexpected loss of one Bulk Electric System Facility caused by a single initiating failure or outage could be interpreted as an N-2 contingency, or an N-1-1 contingency, and not an N-1 contingency as intended. The term "event" is used throughout the NERC Reliability Standards and in the NERC performance table. The WECC TSS suggests that definitions be developed for both single and multiple contingencies since both are referred to in the standard. WECC has individual definitions for single and multiple contingency as follows: Single Contingency - The loss of a single system element under any operating condition or anticipated mode of operation. Multiple Contingency Outages - The loss of two or more system elements caused by unrelated events or by a single low probability event occurring within a time interval too short (less than ten minutes) to permit system adjustment in response to any of the losses.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Chuck Stigers**	
Organization:	**NorthWestern Energy**	
Telephone:	**(406) 497-4538**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☐ NPCC ☐ SERC ☐ SPP ☒ WECC ☐ NA — Not Applicable	☒	1 — Transmission Owners
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Comment Form for Definition of Contingency

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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   ☐ Yes

   ☒ No

   Comments: The WECC Techanical Studies Subcommittee (TSS) prefers the old definition. WECC understands the term "event" could lead to the loss of an element due to electrical AND non-electrical reasons such as lightning, fires, airplanes, wind, etc. The proposed change could introduce confusion. For example, an unexpected loss of one Bulk Electric System Facility caused by a single initiating failure or outage could be interpreted as an N-2 contingency, or an N-1-1 contingency, and not an N-1 contingency as intended. The term "event" is used throughout the NERC Reliability Standards and in the NERC performance table. The WECC TSS suggests that definitions be developed for both single and multiple contingencies since both are referred to in the standard. WECC has individual definitions for single and multiple contingency as follows: Single Contingency - The loss of a single system element under any operating condition or anticipated mode of operation. Multiple Contingency Outages - The loss of two or more system elements caused by unrelated events or by a single low probability event occurring within a time interval too short (less than ten minutes) to permit system adjustment in response to any of the losses.

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NERC Region		**Registered Ballot Body Segment**
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	☐	9 — Federal, State, Provincial Regulatory, or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **ISO/RTO Council**

Lead Contact: Bruce Balmat

Contact Organization: PJM

Contact Segment: 2

Contact Telephone: 610-666-8860

Contact E-mail: balmatbm@pjm.com

Additional Member Name	Additional Member Organization	Region*	Segment*
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Lisa Szot	CAISO		2
Sam Jones	ERCOT		2
Ron Falsetti	IESO		2
Pete Brandien	ISONE		2
Bill Phillips	MISO		2
Mike Calimano	NYISO		2
Charles Yeung	SPP		2

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Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments:

   (i) Change of the definition during the development of a Reliability Standard without reviewing other standards for consistency is potentially problematic.

   The SRC proposes that the approved Version 0 definition that appears in the approved and posted NERC Glossary of Terms be retained. The definition is as follows;

   The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element.

   (ii) Standard FAC-010-1, requirement R4.2.2 is not totally consistent with standard TPL-002-0. TPL-002-0 requires that category "B" contingencies as listed in Table1 be observed. Table 1 of the standard includes requirements stated in FAC-010-1 R4.2.2 and 4.2.3, but also includes the "Loss of an Element without a Fault", as a requirement to be met. FAC-010-1 as currently written would appear to exclude the loss of any single bus or an inadvertent breaker opening. These are single contingencies that can remove additional bulk electricity system (BES) facilities or reconfigure the BES to the point where the BES could be in a cascading situation. It needs to be clarified whether the exclusion of a single bus or an inadvertent breaker operation from Requirement R4.2.2 was deliberate, or was it just an oversight.

   (iii) Standard FAC-010-1 R4.2 states: "Following the single Contingencies identified in Requirements 4.2.1 through Requirements 4.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their thermal, voltage and stability limits; and Cascading Outages or uncontrolled separation shall not occur". It does not make provision for respecting the applicable ratings as stipulated in Table 1 of TPL-002-1

   SRC Recommendations:

   1). Retain the Version 0 definition on Contingency. However, if the definition needs to be revised to capture the possible loss of more than one element due to failure or outage of a single component, then we'd recommend that the definition be expanded to:

The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element, that could result in the loss of one or more bulk electricity system facilities.

2) It needs to be clarified whether the exclusion of "loss of an element without a fault" from Requirement 4.2.2 is deliberate and its rationale, or include this requirement in R4.2.2.

3). Revise R4.2 to "Following the single Contingencies identified in FAC-010 Requirement 4.2.1 through Requirement 4.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their applicable Normal and Emergency thermal ratings, voltage and stability limits, and Cascading Outages or uncontrolled separation shall not occur."

The SRC appreciates the opportunity to table these comments and looks forward to participating further in the standards development process.

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NERC Region		**Registered Ballot Body Segment**
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	☐	9 — Federal, State, Provincial Regulatory, or other Government Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: **Southern Company Services, Inc.**

Lead Contact: Marc M. Butts

Contact Organization:

Contact Segment:

Contact Telephone: 205-257-4839

Contact E-mail: mmbutts@southernco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Jim Viikinsalo	Southern Company Services, Inc.	SERC	1
Jim Busbin	Southern Company Services, Inc.	SERC	1
Wade Pugh	Southern Company Services, Inc.	SERC	1
Steve Corbin	Southern Company Services, Inc.	SERC	1
Roman Carter	Southern Company Generation	SERC	6
Terry Crawley	Southern Nuclear	SERC	5
Roger Green	Southern Company Generation	SERC	5

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Background:
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> **Contingency:** The unexpected loss of one or more Bulk Electric System Facilities caused by a single initiating ~~event~~ failure or outage.

Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: We prefer a definition of greater clarity, which does not include multiple facilities in close proximity (such as common R-O-Ws or double-circuit towers) to be considered as a single contingency. Therefore, we propose to leave unchanged the definition of Contingency as presently listed in the --Glossary of Terms Used in Reliability Standards--.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Roger Champagne**	
Organization:	**Hydro-Québec TransÉnergie**	
Telephone:	**(514)289-2211, ext. 2766**	
E-mail:	**champagne.roger.2@hydro.qc.ca**	
NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☒	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*
			2

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Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: Hydro-Québec TransÉnergie (HQTÉ) prefers the Version 0 definition that appears in the approved and posted NERC Glossary of Terms which corresponds to the N-1 Criterion. The definition is:

   "The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element."

   Change of the definition during the development of a Reliability Standard without reviewing other standards for consistency is potentially problematic.

   Additionally, a revision to the definition 'contingency' only, fails to fully capture concerns previously raised with this standard. Specifically it does not require consideration of credible multiple element contingencies as previously commented by the industry.

   We recognize that the Standards Drafting Team has included a provision in section R4.5 which permits a Region to establish criteria requiring consideration of credible multiple element contingencies. However, we believe that reliability standards recognizing this class of contingencies should be maintained in all of North America, not only certain Regions. A weakening of reliability standards in any Region could adversely affect the reliability in another Region, even if the other Region has adopted more stringent standards.

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Group Comments (Complete this page if comments are from a group.)

Group Name: **FRCC**

Lead Contact: Eric Senkowicz

Contact Organization: FRCC

Contact Segment: 2

Contact Telephone: 813-289-5644

Contact E-mail: esenkowicz@frcc.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Roger Westphal	Gainesville Regional Utilities	FRCC	3
Eric Grant	Progress Energy - Florida	FRCC	1
Ron Donahey	Tampa Electric Company	FRCC	1
Gene Way	Florida Municipal PowerAgency	FRCC	3
Bill Rouse	Orlando Utilities Commission	FRCC	1
Preston Pierce	Progress Energy - Florida	FRCC	1
Gary Baker	JEA	FRCC	1
Linda Campbell	FRCC	FRCC	2

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Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: We appreciate the effort at addressing the earlier comments with regard to the definition of "contingency" and agree that " failure or outage" are preferable to "event", but we still prefer the current definition contained in the Reliability Standards glossary. The new definition seems to add ambiguity.

   Current Definition: "The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element."

Comment Form for Definition of Contingency

Please use this form to submit comments on the Determine Facility Ratings Drafting Team's revised definition of Contingency. Comments must be submitted by **January 17, 2006.** You must submit the completed form by emailing it to sarcomm@nerc.com with the words "Contingency Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

DO: **Do** enter text only, with no formatting or styles added.
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Do not use numbering or bullets in any data field.
Do not use quotation marks in any data field.
Do not submit a response in an unprotected copy of this form.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	**Michael Calimano**	
Organization:	**New York Independent System Operator**	
Telephone:	**518-356-6129**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA — Not Applicable	☐	1 — Transmission Owners
	☒	2 — RTOs, ISOs, Regional Reliability Councils
	☐	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory, or other Government Entities

Comment Form for Definition of Contingency

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background:
During the first ballot and re-ballot of FAC-010 - System Operating Limits Methodology and FAC-011 - Establish and Communicate System Operating Limits, stakeholders indicated that the definition of contingency could have multiple interpretations, and asked the drafting team to modify the definition to clarify the intent. The drafting team modified the definition as follows:

> **Contingency:** The unexpected loss of one or more Bulk Electric System Facilities caused by a single initiating ~~event~~ failure or outage.

Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments:

   1) Change of the definition during the development of a Reliability Standard without reviewing other standards for consistency is potentially problematic.

   The NYISO proposes that the approved Version 0 definition that appears in the approved and posted NERC Glossary of Terms be retained. The definition is as follows;

   "The unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element. "

   The NYISO appreciates the need to modify the definition, however it should be done as a change to the Glossary of Terms with consideration give to all approved standards.

   2) It needs to be clarified whether the exclusion of "loss of an element without a fault" from Requirement 4.2.2 is deliberate and its rationale, or include this requirement in R4.2.2.

   Standard FAC-010-1, requirement R4.2.2 is not totally consistent with standard TPL-002-0. TPL-002-0 requires that category "B" contingencies as listed in Table1 be observed. Table 1 of the standard includes requirements stated in FAC-010-1 R4.2.2 and 4.2.3, but also includes the "Loss of an Element without a Fault", as a requirement to be met. FAC-010-1 as currently written would appear to exclude the loss of any single bus or an inadvertent breaker opening. These are single contingencies that can remove additional bulk electricity system (BES) facilities or reconfigure the BES to the point where the BES could be in a cascading situation. It needs to be clarified whether the exclusion of a single bus or an inadvertent breaker operation from Requirement R4.2.2 was deliberate, or was it just an oversight.

   3) Revise R4.2 to "Following the single Contingencies identified in FAC-010 Requirement 4.2.1 through Requirement 4.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their applicable Normal and Emergency thermal ratings, voltage and stability limits, and Cascading Outages or uncontrolled separation shall not occur."

Standard FAC-010-1 R4.2 states: "Following the single Contingencies identified in Requirements 4.2.1 through Requirements 4.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their thermal, voltage and stability limits; and Cascading Outages or uncontrolled separation shall not occur". It does not make provision for respecting the applicable ratings as stipulated in Table 1 of TPL-002-1

The NYISO appreciates the opportunity to provide these comments and looks forward to participating further in the standards development process.

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NERC Region		**Registered Ballot Body Segment**
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Group Comments (Complete this page if comments are from a group.)

Group Name: **Midwest Reliability Organization (MRO)**

Lead Contact: Tom Mielnik

Contact Organization: MRO for group (MEC for lead contact)

Contact Segment: 2

Contact Telephone: 563-333-8129

Contact E-mail: tcmielnik@midamerican.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Al Boesch	NPPD	MRO	2
Terry Bilke	MISO	MRO	2
Robert Coish	MHEB	MRO	2
Dennis Florom	LES	MRO	2
Ken Goldsmith	Alliant Energy	MRO	2
Todd Gosnell	OPPD	MRO	2
Wayne Guttormson	SPC	MRO	2
Jim Maenner	WPSC	MRO	2
Darrick Moe, Chair	WAPA	MRO	2
Pam Oreschnick	XEL	MRO	2
Dick Pursley	GRE	MRO	2
Dave Rudolph	BEPC	MRO	2
Joe Knight, Secretary	MRO	MRO	2
27 Additional MRO Members	Companies not named above	MRO	2

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background:
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> **Contingency:** The unexpected loss of one or more Bulk Electric System Facilities caused by a single initiating ~~event~~ failure or outage.

Please Enter All Comments in Simple Text Format.

Insert a "check' mark in the appropriate box by double-clicking the gray areas.

1. Do you agree with the proposed change to the definition of 'Contingency'?

   ☐ Yes

   ☒ No

   Comments: The MRO commends the DFRDT on their continuing efforts to clarify FAC-010-1 and FAC-011-1. The MRO has the following comments:

   a. The MRO notes that contingency is currently defined in the existing NERC Glossary of Terms Used in Reliablity Standards (NERC Glossary) as the unexpected failure or outage of a system component, such as a generator, transmission line, circuit breaker, switch or other electrical element. The word contingency appears 103 times in current NERC Reliability Standards including 14 times in defining other NERC terms in the existing NERC Glossary. A change requires a careful examination of the use of the word contingency in all these other NERC standards.

   Also, the MRO notes that the proposed definition is not necessarily consistent with the requirements in the standards. For example, Requirement 4.2 of FAC-010-1 requires that checking for single contingencies consisting of faults or outages that cause the loss of single electric elements. Are faults assumed to be equivalent to failures?

   The MRO believes that the definition contingency does not need to refer to the event causing the contingencies but rather the event itself, namely "the unexpected failure or outage of a system component" as provided in the current definition of contingency included in the NERC Glossary.

   Further, the proposed definition requires that single events which cause one or more element outages is a single contingency. This would say that potentially a single contingency could even be five outages that are caused by a single "failure or outage." This is not consistent with the way in which Bulk Electric Systems in NERC have been planned or operated historically.

   Therefore, the MRO recommends that the DFRDT leave the definition for contingency unchanged from the current definition in the NERC Glossary.

   The MRO does not support the revised definition as well as the original definition offered in the proposed FAC-010-1.

b. Although the DFTDT has not asked for comments beyond the definition for contingency, the MRO offers the following additional comments on the FAC-010-1 Standard:

FAC-010-1 R8 - There is no measurement for this requirement. This requirement should be incorporated into R7.

FAC-010-1 R2.1 – The application of the term System Operating Limit, specifically regarding the word Operating, to the Planning Horizon is confusing and should be clarified.

FAC-010-1 R1 - The roles of the: Reliability Coordinator, Planning Authority, Regional Reliability Organization, Transmission Service Provider, Transmission Operator, Transmission Owner, and Transmission Planner need to be clarified with respect to System Operating Limits. The SDT needs to recognize the risk of inconsistency with these standards as well as other standards currently under development.