

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

Please use this form to submit comments on the Determine Facility Ratings Drafting Team's proposed Implementation Plan and recommendations for retirement or revision to Version 0 Standards FAC-004-0, FAC-005-0 and TOP-004-0. Comments must be submitted by **July 15, 2005**. You must submit the completed form by emailing it to sarcomm@nerc.com with the words "Implementation Plan DFR Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609.452.8060.

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 Do use punctuation and capitalization as needed (except quotations).
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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:	Ray Morella	
Organization:	FirstEnergy Corp	
Telephone:	330.384.5686	
Email:	morellar@firstenergycorp.com	
NERC Region	Registered Ballot Body Segment	
<input type="checkbox"/> ERCOT	X	1 - Transmission Owners
X ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

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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 Email:			
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.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

The Determine Facility Ratings Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Consideration of the Comments submitted on the 3rd Draft of the Determine Facility Ratings Standards
- Clean version of the 4th draft of the Determine Facility Ratings Standards
- Red Line version of the 4th draft of the Determine Facility Ratings Standards
- Implementation Plan
- Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards:

FAC-004-0 Methodologies for Determining Electrical Facility Ratings

- Retire the entire standard coincident with the implementation of FAC-008-1.

FAC-005-0 Electrical Facility Ratings for System Modeling

- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
 - R6.1
 - R6.5

The Determine Facility Ratings Standard Drafting Team's Implementation Plan includes 4 months for entities to achieve full compliance with the proposed requirements. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until March 1, 2006 to achieve full compliance.

The Drafting Team's reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	John Horakh – 07-08-2005	
Organization:	MAAC	
Telephone:	609-625-6014	
Email:	john.horakh@pepcoholdings.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	X	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	
X <input type="checkbox"/> MAAC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAPP	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> NPCC	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SERC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	8 - Small Electricity End Users
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<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

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X Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

X Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

X Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

X No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

X No

Comments:

It makes more sense to have the Compliance Date be some amount of time after the Effective Date, not some amount of time after the Board Adoption Date, as suggested. The Board may not set the Effective Date at two months after the Adoption date. Even if they do, four months after Board

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Adoption only allows two months after the Effective Date. I suggest Compliance Date should be three months after Effective Date.

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(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
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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: (334) 427-3341
 Contact Email: kvongkh@entergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Darrell Pace	Alabama Electric Cooperative	SERC	1
Art Brown	SCPSA (Santee Cooper)	SERC	1
Bob Jones	Southern Company Services	SERC	1
Pat Huntley	SERC	SERC	2
Brian Moss	Duke Power Company	SERC	1
David Till	Tennessee Valley Authority	SERC	1

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Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

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Yes

No

Comments:

Recommend that the adoption date for FAC-010 through FAC-013 be extended an additional two months to May 1, 2006. The SERC PSS feels that developing documentation of the methodologies requires six months in consideration that the first two months fall during traditional holiday periods and year-end closures.

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1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

Why can't FAC-008-1 become FAC-004-1 rather than deleting FAC-004-0 and creating a new FAC-008-1? It seems that the proposed changes will create confusing gaps in the Standards.

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments:

Why can't FAC-009-1 become FAC-005-1 rather than deleting FAC-005-0 and creating a new FAC-009-1? It seems that the proposed changes will create confusing gaps in the Standards.

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Travis Besier or Ellis Rankin
Organization:	TXU Electric Delivery Company
Telephone:	214-486-4917 or 214-743-6825
Email:	tbesier1@txued.com or erankin@txued.com
NERC Region	Registered Ballot Body Segment
<input checked="" type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

Please use this form to submit comments on the Determine Facility Ratings Drafting Team's proposed Implementation Plan and recommendations for retirement or revision to Version 0 Standards FAC-004-0, FAC-005-0 and TOP-004-0. Comments must be submitted by **July 15, 2005**. You must submit the completed form by emailing it to sarcomm@nerc.com with the words "Implementation Plan DFR Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609.452.8060.

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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:	Kenneth A. Goldsmith
Organization:	Alliant Energy
Telephone:	319-786-4167
Email:	kengoldsmith@alliantenergy.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input checked="" type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

The Determine Facility Ratings Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Consideration of the Comments submitted on the 3rd Draft of the Determine Facility Ratings Standards
- Clean version of the 4th draft of the Determine Facility Ratings Standards
- Red Line version of the 4th draft of the Determine Facility Ratings Standards
- Implementation Plan
- Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards:

FAC-004-0 Methodologies for Determining Electrical Facility Ratings

- Retire the entire standard coincident with the implementation of FAC-008-1.

FAC-005-0 Electrical Facility Ratings for System Modeling

- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
 - R6.1
 - R6.5

The Determine Facility Ratings Standard Drafting Team's Implementation Plan includes 4 months for entities to achieve full compliance with the proposed requirements. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until March 1, 2006 to achieve full compliance.

The Drafting Team's reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

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

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

A concern relating to FAC-008-1 and FAC-009-1 is compliance by IPP's. It is our expectation that the RRO will be responsible to verify the compliance of IPP's and not the transmission owner/balancing authority that the IPP happens to be connected to.

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	X 5 - Electric Generators
<input type="checkbox"/> MAPP	X 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
X SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

**COMMENT FORM FOR
DETERMINE FACILITY RATINGS DRAFTING TEAM’S PROPOSED
IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED
VERSION 0 STANDARDS**

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

Group Name: **Southern Co. Generation**
 Lead Contact: Roman Carter
 Contact Organization: Southern Co. Generation
 Contact Segment: 6
 Contact Telephone: 205.257.6027
 Contact Email: jrcarter@southernco.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Roger Green	SoCo Generation	SERC	5
Tom Higgins	SoCo Generation	SERC	5
Terry Crawley	SoCo Generation / Southern Nuclear	SERC	5
Roman Carter	Southern Co. Generation	SERC	6
Lucius Burris	Southern Co. Generation	SERC	6
John McCoy	Southern Co. Generation	SERC	6

* 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.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

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- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
 - R6.1
 - R6.5

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Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

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

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments: However, TOP-004-0 R4.1 states "Each Transmission Operator shall operate within the Interconnection Reliability Operating Limits (IROLs) and System Operating Limits (SOLs)." Our YES response assumes that if the Transmission Operator respects the established SOLs and IROLs no facility ratings will be exceeded that could cause equipment damage. Otherwise, it would be appropriate to add a statement to this effect to TOP-004-0 or have TOP-004-0 refer to FAC-010-1 requirement R1.2.

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

We agree with 4 months to prepare the Facility Ratings methodology that FAC-008-1 requires. However, an additional sequential time period should be allowed for facility owners to ensure documentation of the facility ratings is in place or is developed to satisfy the requirements of FAC-009-1. This is especially important for owners of large numbers of generation facilities that were designed and built over a long period of time.

We recommend a minimum implementation period of 12 months, with additional allowances or exceptions for older facilities where the desired documentation may no longer exist or is not otherwise readily available, because new documentation would have to be developed for those facilities. Operating experience should be allowed in these cases to help justify additional time for development of the desired documentation.

Additionally, this standard seems to indicate that predetermined lists of Emergency Ratings, System Operating Limits (SOLs), and Transfer Capabilities be published and exchanged. Southern Generation seeks clarification of these requirements.

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

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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	
Email:	wsmith1@alleghenypower.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input checked="" type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC		
<input type="checkbox"/> NA - Not Applicable		

**COMMENT FORM FOR
DETERMINE FACILITY RATINGS DRAFTING TEAM’S PROPOSED
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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 Email:

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.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

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- Retire the entire standard coincident with the implementation of FAC-008-1.

FAC-005-0 Electrical Facility Ratings for System Modeling

- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
 - R6.1
 - R6.5

The Determine Facility Ratings Standard Drafting Team's Implementation Plan includes 4 months for entities to achieve full compliance with the proposed requirements. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until March 1, 2006 to achieve full compliance.

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Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

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

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Kathleen Davis
Organization:	Tennessee Valley Authority
Telephone:	423-751-6172
Email:	kadavis@tva.gov
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

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- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
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Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

TVA is confident it will achieve full compliance, within the proposed 4 month time frame, for FAC-008, -009, -012 and FAC-013. It will be a difficult challenge to achieve full compliance, developing and documenting required methodologies for FAC-010 and FCA-011; however, TVA is committed to applying its resources to successfully meet this challenge.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	Peter Henderson
Organization:	Independent Electricity System Operator, Ontario
Telephone:	905 855-6258
Email:	peter.henderson@ieso.ca
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

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- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
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 - R6.5

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Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

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

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

Element is a defined term in currently approved standards, while Facilities is defined in the proposed DFR standard. Element and facility are both used in the currently approved standards, and in some cases seemingly interchangeably. This creates ambiguity. New standards / revisions should be removing ambiguity not increasing it. This may mean opening up the currently approved standards for revision. The consequence is that the process may get bogged down

As an example the approved standards re:

IRO-002-0 Reliability Coordination - Facilities (R6)

IRO-005 Reliability Coordination - Current Day Operations (R1)and

IRO-003-0 Reliability Coordination - Wide-Area View (R1)

mention the terminologies such as element and facilities.

Looking at the definitions, it is confusing what is an element and what is a facility since Facility uses the term element yet they refer to similar equipment (ie transformer or line).

DFR standard - Facility: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generating plant, a shunt compensator, transformer, etc.)

Approved Version 0 Glossary - Element: Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element may be comprised of one or more components.

Is it proposed by DFR to delete Element? This action is not identified in the Implementation plan. We believe that these discrepancies may be a concern when DFR series of Standards comes to ballot as it raises the question on whether the currently approved standards require updating to reflect proper usage of Facility. Implementation plans must look at the whole scope of any change not just at what will be retired.

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

FAC-010-1 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."

In FAC-010-1 R4.2.2. the requirements state that the "Loss of any generator, line, transformer, or shunt device without a Fault." must be observed for 4.2.

This seems to exclude the loss of any single bus or an inadvertent breaker opening. Either of these are single contingencies that can remove additional BES equipment or reconfigure the BES to the point where the BES could be in a cascading situation. As such these losses must be observed. Was this exclusion deliberate or just overlooked?

This is not consistent with TPL series of standards that state the "B" contingencies must be observed. The table highlights those requirements stated in FAC-010-1 R4.2.2 and 4.2.3, but goes on the state "Loss of an Element without a Fault".

DFR Standards infers that the system should be operated to N-2.

Specifically FAC-010-1 R4.2 which 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."

While we agree with everything up to "within their thermal," and after "and cascading", we have a concern that all facilities must be operated such that following a contingency they must still be respecting Voltage and Stability limits. The way it is written it infers that this must be respected as part

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

of the outcome of the contingency (ie immediately after the contingency), we are really saying that we must be operating to N-2 Pre-contingency.

In theory, current standards require action ASAP to get within voltage and stability limits, but allow "30 minutes" to be at this requirement following a contingency from a compliance perspective.

The draft Standard FAC-010-1 does not include "the imposition of multiple element Category C" contingencies which are in the current TPL-002-0 standards. This should be included.

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

While we do not have problems with the 4 months period , we do not support the implementation plan until standards referred to in Q1 and Q4 are revised to address the comments.

Questions:

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

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2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

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Yes

No

Comments:

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COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

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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:	Roger Champagne
Organization:	Hydro-Québec TransÉnergie
Telephone:	514-289-2211
Email:	champagne.rogier.2@hydro.qc.ca
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

The Determine Facility Ratings Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

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- Clean version of the 4th draft of the Determine Facility Ratings Standards
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- Implementation Plan
- Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards:

FAC-004-0 Methodologies for Determining Electrical Facility Ratings

- Retire the entire standard coincident with the implementation of FAC-008-1.

FAC-005-0 Electrical Facility Ratings for System Modeling

- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
 - R6.1
 - R6.5

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Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

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Questions:

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1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

MOD-001-0 deals with TTC/ATC methodology and FAC-012-1 also deals with Transfer Capability methodology. Are these Transfer Capability the same as TTC/ATC. If they are the same, in the standards mentioned there is inconsistency about who would be responsible to develop the methodology.

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

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 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:	Robert Coish	
Organization:	Manitoba Hydro	
Telephone:	1-204-487-5479	
Email:	rgcoish@hydro.mb.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/>	5 - Electric Generators
<input checked="" type="checkbox"/> MAPP	<input checked="" type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

The Determine Facility Ratings Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

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FAC-005-0 Electrical Facility Ratings for System Modeling

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TOP-004-0 Transmission Security

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 - R6.5

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Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

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Questions:

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

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Mike Viles	
Organization:	Bonneville Power Administration	
Telephone:	(360) 418-2322	
Email:	mrviles@bpa.gov	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	X	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
X <input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable		

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Yes

No

Comments:

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Yes

No

Comments

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Yes

No

Comments:

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Yes

No

Comments:

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Yes

X No

Comments:

The months following the Board of Trustees' adoption date are not only traditional holiday periods but are also busy end-of-year months. Considering this, we recommend that the Compliance Date be moved out two months, to May 01, 2006. This will allow a more adequate amount of time to verify the

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

completeness of methodologies and the development of the structure for tracking and responding to comments.

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

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Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
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<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

**COMMENT FORM FOR
DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED
IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED
VERSION 0 STANDARDS**

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

Group Name: **Southern Company - Transmission**

Lead Contact: **Marc M. Butts**

Contact Organization: **Southern Company Services**

Contact Segment: **1**

Contact Telephone: **205-257-4839**

Contact Email: **mmbutts@southernco.com**

Additional Member Name	Additional Member Organization	Region*	Segment*
Jim Viikinsalo	Southern Company Services	SERC	1
Jim Busbin	Southern Company Services	SERC	1
Doug McLaughlin	Southern Company Services	SERC	1
Keith Calhoun	Southern Company Services	SERC	1
Bobby Jones	Southern Company Services	SERC	1
Raymond Vice	Southern Company Services	SERC	1
Jim Griffith	Southern Company Services	SERC	1
Dean Ulch	Southern Company Services	SERC	1
Phil Winston	Georgia Power Company	SERC	3

* 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.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

The Determine Facility Ratings Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Consideration of the Comments submitted on the 3rd Draft of the Determine Facility Ratings Standards
- Clean version of the 4th draft of the Determine Facility Ratings Standards
- Red Line version of the 4th draft of the Determine Facility Ratings Standards
- Implementation Plan
- Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards:

FAC-004-0 Methodologies for Determining Electrical Facility Ratings

- Retire the entire standard coincident with the implementation of FAC-008-1.

FAC-005-0 Electrical Facility Ratings for System Modeling

- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
 - R6.1
 - R6.5

The Determine Facility Ratings Standard Drafting Team's Implementation Plan includes 4 months for entities to achieve full compliance with the proposed requirements. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until March 1, 2006 to achieve full compliance.

The Drafting Team's reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

Transmission and Generation owners need more time to develop the methodologies themselves, prior to compiling extensive documentation of those methodologies. Exceptions should be considered for older facilities where the desired documentation no longer exists or is not otherwise readily available.

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees’ adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

Yes

No

Comments:

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In FAC-008-1, the Transmission and Generation owners will need more time to develop the methodologies themselves, prior to compiling extensive documentation of those methodologies. We suggest an extra two months, for a total of six months. Exceptions should be considered for older facilities where the desired documentation no longer exists or is not otherwise readily available. For the very old facilities where documentation is more difficult to find, we suggest one year.

General comment 1 - Implementation time for FAC-010-1 (Develop System Operating Limits Methodology) and FAC-011-1 (Establish and communicate SOL) are at the same time. Should there be time allowed to develop the actual limits based on the methodology established? It does not make sense to have them at the same time unless you are documenting an established methodology that already has been applied.

General comment 2 - The same issue applies to FAC-012-1 and FAC-013-1 for the Transfer capability methodology and limits. Should there be some time allowed for applying the developed methodology?

General comment 3 - Is there a different implementation time for FAC-008 versus the other standards?

General comment 4 – What is the best way to prove you made methodologies available upon request? Will an email or letter, listing a time within 15 days that the document can be inspected suffice?

General comment 5 - What is considered appropriate evidence that a Reliability Authority or Planning Authority issued its SOL Methodology? What are the best ways to “issue” the methodology?

General comment 6 - How do you demonstrate that you calculated your SOL consistent with the methodology? Do you have to document the steps for every SOL in case the auditor ask for a specific SOL or is documentation of your steps in developing the SOL sufficient?

General comment 7 - On page 13 of 15 (of the Implementation Plan document), the “preparation statement for M1 indicates that the SDT believes that the SOLs will be calculated during the time that the methodology is being developed.” We don’t necessarily agree with this assessment. The methodology can be developed through some example calculations for parts of the system or representative conditions and not necessarily for all of those that will eventually materialize. Adequate time should be allowed to calculate SOLs from the developed methodology.

General comment 8 - The same comments related to SOLs expressed in item 7 apply to FAC-013-1 for transfer capability. Methodology could be developed for sample interfaces, etc and not necessarily for all.

General comment 9 - This collection of standards requires the publication of the methodologies for determining Facility Ratings and Transfer Capabilities, and for identifying SOLs and IROLs. It requires the publication of static facility ratings. Methodologies and ratings are to be exchanged between RCs, RROs, TOs, TSPs, PA etc. Southern supports these practices.

General comment 10 - These standards also seem to indicate that predetermined lists of Emergency Ratings, System Operating Limits (SOLs), and Transfer Capabilities also be published and exchanged. Southern seeks clarification of these requirements. It is the practice within much of the industry to utilize ambient adjusted facility ratings based upon actual conditions using programs such as EPRI's Dynamp. The standard should allow for the publication of the methodology used for determining real time facility ratings rather than requiring the publication of a table of static "emergency ratings".

General comment 11 - Likewise, Transfer Capabilities and SOLs vary significantly depending upon system conditions such as weather, outages, loads, dispatch, loopflows, etc. A predetermined list of SOLs (or Transfer Capabilities) could only be based upon static assumptions and could grossly overstate or understate the actual system capability in real time. This approach is useful in establishing bounded limits to address constraints that cannot be evaluated in real time, such as complex stability constraints. However, for the majority of SOLs which are thermal or voltage related, and can be better evaluated in real time using state estimators, a static list of SOLs would be too prescriptive.

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General comment 12 - The standard should allow for the publication of the methodology used for determining these values rather than publishing static values. If the drafting committee determines that a list of SOLs must be published, language should be added to indicate the conditions for which the values are valid. The language used in several places in the proposed standards that "SOLs shall not exceed associated Facility Ratings" should be clarified accordingly.

COMMENT FORM FOR DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

Please use this form to submit comments on the Determine Facility Ratings Drafting Team's proposed Implementation Plan and recommendations for retirement or revision to Version 0 Standards FAC-004-0, FAC-005-0 and TOP-004-0. Comments must be submitted by **July 15, 2005**. You must submit the completed form by emailing it to sarcomm@nerc.com with the words "Implementation Plan DFR Standard 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.
 Do use punctuation and capitalization as needed (except quotations).
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 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:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

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- Retire the entire standard coincident with the implementation of FAC-008-1.

FAC-005-0 Electrical Facility Ratings for System Modeling

- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

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Questions:

Insert a “check” mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

No

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Yes

No

Comments:

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(Complete this page for comments from one organization or individual.)		
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Group Comments (Complete this page if comments are from a group.)			
Group Name:	Standards Evaluation Subcommittee		
Lead Contact:	Bill Bojorquez		
Contact Organization:	ERCOT		
Contact Segment:			
Contact Telephone:	512-248-3036		
Contact Email:	bbojorquez@ercot.com		
Additional Member Name	Additional Member Organization	Region*	Segment*
R.W Mazur	Manitoba Hydro	MAPP	
Doug McLaughlin	Southern Company Services, Inc	SERC	
Sergio Garza	Lower Colorado River Authority	ERCOT	
Mitchell E. Needham	Tennessee Valley Authority	SERC	
Daniel W. Griffiths	Pennsylvania Office of Consumer Advocate	MAAC	
Ed Kremzier	National Grid USA	NPCC	
Edward C. Pfeiffer	Ameren Corp	MAIN	
Michael C. Raezer	Tucson Electric Power Co.	WECC	

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Please Enter All Comments in Simple Text Format.

Questions:

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

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

Yes

No

Comments:

Reliability Standard FAC-004-0_R1.4 requires that all owners of jointly-owned equipment coordinate in such a manner that only one set of ratings is to be used for the jointly-owned equipment. FAC-008-1 does not address this requirement specifically. The SES believes there should be only one set of ratings, agreed to by all owners, for any piece of jointly-owned equipment and as recommends the SDT include the language used in FAC-004-0_R1.4 in FAC-008-1.

Also, FAC-004-0_R1.1 requires that rating methodologies be developed for both normal and emergency conditions; whereas, FAC-008-1 is not specific in requiring both normal and emergency ratings. The SES believes any requirement for developing rating methodologies should specifically require both normal and emergency conditions.

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

Yes

No

Comments

The SES's previous comments regarding normal and emergency ratings apply to both FAC-009-1 and FAC-005-0 as well.

The SES notes that the purpose as stated in FAC-009-1 is identical to the purpose stated in FAC-008-1. Although the standards are similar, they are in fact different and have different purposes. The SES recommends the Drafting Team revise the Purpose statement of FAC-009-1 to reflect the actual intent of the standard. The same comment can be applied to FAC-010 and FAC-011; as well as FAC-012 and FAC-013.

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

Yes

No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

Yes

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

X No

Comments:

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

X Yes

No

Comments:

The SES believes that determining both normal and emergency ratings for electrical facilities to be fundamental to any TO's or GO's prudent stewardship of its assets; therefore, the SES supports the 4 month requirement.

In addition to the above, the SES offers the following comments and suggestions:

In FAC-010-1_R4.1, the standard refers to the Pre-Contingency State as if it is a defined term; however, the SDT has also deleted the definition for Pre-Contingency State in FAC-010. The SES recommends the phrase current state be substituted for Pre-Contingency State or to continue to use pre-contingency state as a non-defined term (with lower case letters).

In FAC-011-1_R5, it appears that the Transmission Operator was inadvertently left off of the list of functional areas that shall provide SOLs and IROLs. The SES recommends including Transmission Operator in this list to be consistent with FAC-011-1_R2 and R5.2.

Finally, the SES commends the Drafting Team for its work in developing a set of standards that will support the industry in facilitating a more reliable bulk electric transmission system.