

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Jason Shaver	
Organization:	American Transmission Company	
Telephone:	262 506 6885	
E-mail:	jshaver@atcllc.com	
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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

**Group Name:****Lead Contact:****Contact Organization:****Contact Segment:****Contact Telephone:****Contact E-mail:**

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments: Please see our comments below

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: In Order 705, FERC states that it will approve FAC-010-1, Requirement R2.3, and the ERO should ensure that the clarification developed in response to Order No. 693 is made to TPL-002-0. Since FAC-010, and Requirement R2.3.1 specifically, are to reflect the system performance requirements specified in TPL-002, the ERO should modify the text of FAC-010 R2.3.1 to reflect the clarification that FERC desires in TPL-002, after the change has been made to TPL-002.

The text of Footnote 2 should be incorporated into FAC-010 after TPL-002 is changed. Otherwise, the Footnote 2 text is contradictory to the existing R2.3.1 text and Table 1, Footnote b of TPL-002-0.

The text of Footnote 2 is applicable to R2.3.1, not R2.3.2 and R2.3.3. Therefore, when this text is added, then it should be added to R2.3.1, not R2.3.

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments: The SAR should explain the consequence of deleting the language from requirement 2.3.2. The language in question provides an example for Requirement 2.3.2. How should the statement "...if the real-time operating conditions are more adverse than anticipated in the corresponding studies" be interpreted if it is not load greater than studied?

As a Transmission Owner and Operator we are not responsible for load forecasting but we use the load forecasting provided to us for our studies. Is anyone in violation of this Standard if the load forecasted is lower than the actual operating conditions?

The SDT should confirm that this standard dictates what has to be included in a methodology and that it does not dictate how in real-time a Transmission Operator is to act to control to their SOLs/IROLs. This confirmation is needed because other NERC standards address what the Transmission Operator has to do in real-time and that this standard is not one of them.

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments: Issue 1:

ATC interprets that changing its SOL methodology to be compliant with a new FAC-010 standard and establishing new SOLs to be compliant with the FAC-014-1 standard is separate from being compliant with the existing TPL-002-0 standard. The new FAC-010 may lead to the identification of new system operating limit violations, but compliance with TPL-002-0 still depends on dealing with the existing system performance limit violations specified in TPL-002-0.

Therefore, mandatory compliance with FAC-010-2 would involve rewording the SOL methodology by 7/1/2008 to reflect the requirements in the standard. Mandatory compliance with FAC-014-1 by 1/1/2009 would involve recalculating and communicating any revised SOLs based on any changes that were made to the planning horizon SOL methodology. Mandatory compliance with TPL-002-0 would continue involve meeting the system performance requirements specified in this standard, until the standard is changed.

Issue 2:

The SDT should explain why the numbering of Requirement 2.4 in FAC-011-1 and Requirement 2.3.3 in FAC-010-1 are different? Both of these two requirement contain exactly the same language but in FAC-010 is a sub-requirement of R2.3 and in FAC-011 it a sub-requirement of R2.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Phil Park
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<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
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**Contact Telephone:**

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(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

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To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

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R2.3.3. System reconfiguration through manual or automatic control or protection actions.

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The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

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Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

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The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: We have a number of comments. 1. The footnote should be to R2.3.1, not R2.3. 2. Should consider replacing R2.3.1 with the statement in the footnote. 3. Consider the following for R2.3.1: "Planned or controlled interruption of electric supply to radial customers or some local network customers directly served by the elements that are removed from service as a result of the contingency."

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments: The word "outage" following "Cascading" can also be deleted. It is redundant with respect to the definition of Cascading.

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:



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(Complete this page for comments from one organization or individual.)	
Name:	Dale Bodden
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Telephone:	713-207-2806
E-mail:	dale.bodden@centerpointenergy.com
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
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Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: The ATFN SDT is currently refining the definition of Consequential Load Loss based on FERC directives and industry comments. This SDT and the ATFN SDT must coordinate and any footnote included in FAC-010-2 and FAC-011-2 clarifying Consequential Load Loss should contain the latest version of the ATFN SDT definition for the term.

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Jack Kerr	
Organization:	Dominion Virginia Power	
Telephone:	804-273-3393	
E-mail:	jack.kerr@dom.com	
<b>NERC Region (check all Regions in which your company operates)</b>		<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input checked="" type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
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	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: It comes close, but there is still an opportunity to provide more clarity. Even though Order 705 references requirement 2.3 in the discussion of consequential load, the specific concern stated in the Order (paragraph 50) was with the wording of requirement 2.3.1 which is quoted verbatim in that paragraph. Therefore, if a footnote is to be used, it should apply to 2.3.1 only instead of being attached to 2.3. The wording of the proposed footnote is based upon the definition of consequential load provided in Order 693 which limits the interruption of electric supply to the load that is directly served by the elements that are removed from service as a result of the contingency. However, the wording of 2.3.1 refers to load in "the affected area" as well as load "connected to or served by the Faulted Facility" and therefore seems inconsistent with the explanatory footnote (or at least not totally clear). Consequently, a better solution would be to eliminate the footnote on 2.3 and incorporate the definition of consequential load into a revision of 2.3.1 that would read:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

---

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Greg Rowland	
Organization:	Duke Energy	
Telephone:	704-382-5348	
E-mail:	gdrowland@dukeenergy.com	
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

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**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

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The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: The footnote is insufficiently clear and does not reflect the latest work of the TPL Standards Drafting Team. When FAC-010-2 and FAC-011-2 go to ballot, they must contain the latest work of the ATFNSDT work on TPL-001-1 defining Consequential Load. This is supported by FERC's directive in paragraph 53 of Order No. 705 : "Order No. 693 stated that the transmission system should not be planned to permit load shedding for a single contingency. Order No. 693 directed NERC to clarify the planning Reliability Standard TPL-002-0 accordingly. The Commission reaches the same conclusion here. We will approve Reliability Standard FAC-010-1, Requirement R2.3 and the ERO should ensure that the clarification developed in response to Order No. 693 is made to the FAC Reliability Standards as well."

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

---

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments: Standards TPL-001-0 through TPL-004-0 are being rewritten and consolidated into a new TPL-001-1. FAC-010-2 requirements R2.4 and R2.5 contain references to TPL-003, which will necessitate conforming changes to FAC-010-2 when TPL-001-1 is approved.

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Szymczak	
Organization:	ComEd Transmission Planning	
Telephone:	630-437-2795	
E-mail:	ronald.szymczak@exeloncorp.com	
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments: In both standards, FAC-010 and FAC-011, in section R2.2 the following wording change is required: "and Cascading (delete the word "outages") or uncontrolled separation shall not occur"

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Doug Hohlbaugh	
Organization:	FirstEnergy Corp.	
Telephone:	(330) 384-4698	
E-mail:	hohlbaughdg@firstenergycorp.com	
<b>NERC Region (check all Regions in which your company operates)</b>		<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
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Group Comments (Complete this page if comments are from a group.)

**Group Name:**

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**Contact Telephone:**

**Contact E-mail:**

Additional Member Name	Additional Member Organization	Region*	Segment*
Sam Ciccone	FE	RFC	

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The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

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To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments: We agree that the FERC directives have been addressed, however, with regard to the Violation Severity Levels (VSL), it is our understanding the the VSL drafting team (Proj. 2007-23) did not develop VSLs for the FAC-010, -011, and -014 standards and only focused on the initially FERC approved 83 standards. This SAR should more correctly state that the "VSLs will be developed by the FAC SDT and replace the levels of non-compliance" [Note that VSLs for FAC-014-1 should also be developed and in the scope].

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: We suggest that the FAC SDT consider coordination with the ATFN SDT (Proj. 2006-02) since the AFTN team has already proposed, in their initial draft of TPL-001-1, an official NERC term for "Consequential Load Loss".

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

---

Comments: We suggest adding the Violation Risk Factors (VRF) to the text of each requirement in each standard [Note, this should also include adding the VRFs to FAC-014-1].



**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Linda Campbell	
Organization:	FRCC	
Telephone:	813-207-7961	
E-mail:	lcampbell@frcc.com	
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>	
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input checked="" type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

---

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

**Group Name:** FRCC Compliance Committee

**Lead Contact:** Linda Campbell

**Contact Organization:** FRCC

**Contact Segment:** 10

**Contact Telephone:** 813-207-7961

**Contact E-mail:** lcampbell@frcc.com

Additional Member Name	Additional Member Organization	Region*	Segment*

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

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**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

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The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

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Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments: The Compliance Monitoring Responsibility should be the Regional Entity, not the Regional Reliability Organization. The RE's have the authority through their approved Delegation Agreements.

## Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Alessia Dawes	
Organization:	Hydro One Networks	
Telephone:	416-345-5286	
E-mail:	alessia.dawes@hydroone.com	
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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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, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

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No

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Comments:

## Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Roger Champagne	
Organization:	Hydro-Québec TransÉnergie (HQT)	
Telephone:	514 289-2211, X 2766	
E-mail:	champagne.roger.2@hydro.qc.ca	
NERC Region (check all Regions in which your company operates)	Registered Ballot Body Segment (check all industry segments in which your company is registered)	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Ron Falsetti
Organization:	IESO
Telephone:	905-855-6187
E-mail:	ron.falsettiW@ieso.ca
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities





**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
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<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

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To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

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The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.



**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

The ISO RTO Council has filed a Request for Clarification or in the alternative Rehearing. We ask the NERC SDT to consider any further clarifying language FERC requests if they impact FAC-010 and FAC-011.

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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Regarding Footnote (1) on both FAC-010 & 011 - there is no apparent reason to include Footnote (1) as it is editorial, it is not a requirement and it adds no additional clarity. The Requirements already identify what must be studied - which is the purpose of the standard.

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Mazur	
Organization:	Manitoba Hydro	
Telephone:	1-204-669-2735	
E-mail:	rwmazur@hydro.mb.ca	
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

---

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, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

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**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

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Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

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**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

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The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

MH does not see the term "consequential load" used in R2.3 of FAC-10-1 (reproduced below), so what needs to be clarified?

R2.3. Starting with all Facilities in service, the system's response to a single Contingency, may include any of the following:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. System reconfiguration through manual or automatic control or protection actions.

R2.3.3. To prepare for the next Contingency, system adjustments may be made, including changes to generation, uses of the transmission system, and the transmission system topology.

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: MH does not see the term "consequential load" used in R2.3 of FAC-10-1, so what needs to be clarified?

MH disagrees with the footnote 2. R2.3.1 clearly defines that radial load or some local network customers connected to or supplied by the Faulted facility or affected areas can be interrupted. The footnote narrows the definition to only direct connected load, which is not appropriate - creates a conflict with requirement.

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments: The approved definition of cascading is clear. The word "outages" could be removed from the standards without changing the understanding.

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments: MH does not see a reliability need to define SOLs in the planning horizon and believes the Standard FAC-010-1 should be withdrawn. Operators do not use future SOLs, so who benefits from the extra work required to comply with this SAR?



**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
<b>NERC Region (check all Regions in which your company operates)</b>		<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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

**Group Name:** Midwest ISO Stakeholders Standards Collaborators

**Lead Contact:** Marie Knox

**Contact Organization:** Midwest ISO

**Contact Segment:** 2

**Contact Telephone:** 317-249-5264

**Contact E-mail:** mknox@midwestiso.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Dede Subakti	Midwest ISO	RFC, SERC, MRO, SPP	2
Carol Gerou	Minnesota Power	MRO	1,3,5
Jeanne Kurzynowski	Consumers Energy Company	RFC	3,4,5
Jim Cyrulewski, P.E.	JDRJC Associates	RFC	8
Jason Marshall	Midwest ISO	RFC,MRO,SERC,SPP	2

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: The footnote should also explicitly exclude all actions resulting from the operation of UFLS and UVLS.

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments: I agree with the drafting teams removal of the phrase "e.g., load greater than studied". However, the drafting team should delineate between the contingency conditions from the system conditions. The separate system conditions are the reason to adjust generation and not the previously discussed contingency; therefore, the separate system conditions should be emphasize so that there is no missunderstanding.

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments: Should text "(or condition)" be added to the Cascading definition listed in the SAR. Plus, where is the cascading definition in the NERC FAC-010-2 standard? I don't see this definition listed in the NERC FAC-010-2 standard.

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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Comments: Yes, In the brief description section of the SAR (page SAR-2). The violation Risk Factors are suggested to be updated in accordance with FERC order 750. Isn't this FERC order 705?

The VSL drafting team did not create VSLs for these two standards. Thus, creation of VSLs should be added to the scope of this SAR.

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
<b>NERC Region (check all Regions in which your company operates)</b>		<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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

**Group Name:** MRO NERC Standards Review Sub-Committee

**Lead Contact:** Pam Oreschnick

**Contact Organization:** XCEL

**Contact Segment:** 1,3,5,6

**Contact Telephone:** 612-337-2376

**Contact E-mail:** pamelaj.oreschnick@xcelenergy.com

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPA	MRO	3,4,5,6
Terry Bilke	MISO	MRO	2
Robert Coish	MHEB	MRO	1,3,5,6
Carol Gerou	MP	MRO	1,3,5,6
Jim Haigh	WAPA	MRO	1,6
Ken Goldsmith	ALTW	MRO	4
Tom Mielnik	MEC	MRO	1,3,5,6
Dave Rudolph	BEPC	MRO	1,3,5,6
Eric Ruskamp	LES	MRO	1,3,5,6
Joseph Knight	GRE	MRO	1,3,5,6
Larry Brusseau	MRO	MRO	10
Michael Brytowski	MRO	MRO	10
27 Members	Not mentioned above	MRO	10

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments: The MRO agrees with the drafting teams removal of the phrase "e.g., load greater than studied"; however, the drafting team should further clarify the subrequirement. The MRO finds the use of 'or' in the subrequirement to be very confusing. The MRO also would like clarification on 'Prior Outage'.

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments: Yes, In the brief description section of the SAR (page SAR-2). The Violation Risk Factors are suggested to be updated in accordance with FERC order 750, should be FERC Order 705.



**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
<b>NERC Region (check all Regions in which your company operates)</b>		<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input checked="" type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Group Comments (Complete this page if comments are from a group.)			
<b>Group Name:</b>	NPCC Regional Standards Committee		
<b>Lead Contact:</b>	Guy Zito		
<b>Contact Organization:</b>	NPCC		
<b>Contact Segment:</b>	Regional Standards		
<b>Contact Telephone:</b>	212-840-1070		
<b>Contact E-mail:</b>	Gzito@npcc.org		
<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Lee Pedowicz	NPCC	NPCC	10
Brian Evans-Mongeon	Utility Services, LLC	NPCC	6
Randy MacDonald	New Brunswick System Operator	NPCC	2
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1, 2
Ronald Hart	Dominion Resources, Inc.	NPCC	5
Biju Gopi	Independent Electricity System Operator	NPCC	2
Murale Gopinathan	Northeast Utilities	NPCC	1, 4
Michael Ranalli	National Grid	NPCC	1, 4
Kathleen Goodman	ISO New England	NPCC	2
Ralph Rufrano	New York Power Authority	NPCC	1, 4, 5, 6, 9
Peter Yost	Consolidated Edison Company of New York, Inc.	NPCC	1, 4, 5, 6
Roger Champagne	Hydro-Quebec TransEnergie	NPCC	1, 2
Gregory Campoli	New York Independent System Operator	NPCC	2
Brian Gooder	Ontario Power Generation Incorporated	NPCC	5
Donald Nelson	Massachusetts Department of Public Utilities	NPCC	9
David Kiguel	Hydro One	NPCC	1, 3

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.



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R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

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Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

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The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	John P. Mayhan	
Organization:	Omaha Public Power District	
Telephone:	(402) 552-5173	
E-mail:	jmayhan@oppd.com	
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>	
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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

**Group Name:**

**Lead Contact:**

**Contact Organization:**

**Contact Segment:**

**Contact Telephone:**

**Contact E-mail:**

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: The placement of the superscript 2 at the end of R2.3 of FAC-011 makes R2.3.2 inconsistent with R2.3, because R2.3.2 allows interruption of other network customers under certain conditions. It would seem to be better to place the superscript 2 at the end of R2.3.1 rather than at the end of R2.3, in both FAC-010 and FAC-011.

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments: Withdrawal of the definition for Cascading Outage is acceptable, but the manner in which FAC-010 and FAC-011 were revised makes for awkward reading, because the approved definition of Cascading treats the term Cascading as a noun, while the revised versions of FAC-010 and FAC-011 use the term as an adjective (modifying the word outages). It would seem to be more proper grammatically, in FAC-010 and FAC-011, to replace the words Cascading Outages by just the word Cascading (i.e., striking the word Outages).



**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Stan Southers / Ellis Rankin
Organization:	Oncor Electric Delivery Company LLC
Telephone:	214-486-2084 / 214-743-6825
E-mail:	stan.southers@oncor.com / erankin@oncor.com
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
<input checked="" type="checkbox"/> <b>ERCOT</b>	<input checked="" type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/> 2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities

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, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments: Oncor endorses the changes as made by the standards drafting team.

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

## Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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

**Group Name:** Pepco Holdings, Inc. - Affiliates

**Lead Contact:** Richard J. Kafka

**Contact Organization:** Pepco Holdings, Inc.

**Contact Segment:** 1

**Contact Telephone:** 301-469-5274

**Contact E-mail:** rjkafka@pepcoholdings.com

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>
Bill Mitchell	Delmarva Power	RFC	1
John Radman	Potomac Electric Power Co.	RFC	1

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.



**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: The proposed footnote, if it is to be used, should be applied to R2.3.1 only and not to R2.3 in general. The wording of the proposed footnote limits the interruption of electric supply to the load directly served by the elements that are removed from service by the single contingency. The footnote is silent on "affected area" load. In order to clarify R2.3.1 would be better to eliminate the proposed footnote and modify R2.3.1 with the following:

R2.3.1 Planned or controlled interruption of electric supply to radial customers or some local network customers load that is directly served by the elements that are removed from service as result of the contingency.

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

---

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Mark Kuras
Organization:	PJM
Telephone:	610-666-8924
E-mail:	kuras@pjm.com
<b>NERC Region (check all Regions in which your company operates)</b>	<b>Registered Ballot Body Segment (check all industry segments in which your company is registered)</b>
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
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<input type="checkbox"/> MRO	<input type="checkbox"/> 3 — Load-serving Entities
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<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large 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:**

<b>Additional Member Name</b>	<b>Additional Member Organization</b>	<b>Region*</b>	<b>Segment*</b>

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

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R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.



**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments: Since the term consequential load is used in other standards, this definition should be added to the NERC Glossary. This should be left up to the standard drafting team and consensus of industry comments.

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments: Removing this example would make the standard less clear but this removal does not change the intent. This should be left up to the standard drafting team and consensus of industry comments.

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments: The proposed use of Cascading adequately covers the intent of the Standard.

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments: Revision of the standards should be left up to the standard drafting team and consensus of industry comments.



## Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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

**Group Name:** Public Service Commission of South Carolina

**Lead Contact:** Phil Riley

**Contact Organization:** Public Service Commission of South Carolina

**Contact Segment:** 9

**Contact Telephone:** 803-896-5154

**Contact E-mail:** philip.riley@psc.sc.gov

Additional Member Name	Additional Member Organization	Region*	Segment*

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

**Background Information:**

[FERC Order 705](#) directed NERC to make certain modifications to FAC-010 and FAC-011. There are some directives that mandate specific Violation Risk Factor modifications, and NERC staff is responding to these directives. The directives in the Order that are within the scope of this SAR and subject to stakeholder consensus include the following:

**Order 705 — Section 2 — Loss of Consequential Load — (paragraphs 50–53) directs NERC to clarify, in both FAC-010-1 Requirement R2.3 and FAC-011-1 Requirement R2.3 what is meant by the term, “consequential load.”**

(Order 693 defined consequential load, at P 1794 n.461: “Consequential load is the load that is directly served by the elements that are removed from service as a result of the contingency.”)

To address this directive, the drafting team added the following footnote to R2.3:

The interruption of electric supply is limited to the load that is directly served by the elements that are removed from service as a result of the contingency.

**Order 705 — Section 4 — Load Forecast Error — (paragraphs 59–70) directs NERC to modify R2.3.2 to clarify that “load greater than studied” cannot be treated as a contingency and suggested that elimination of the phrase from the requirement would be a sufficient remedy.**

To address this directive, the drafting team modified R2.3.2 to eliminate the identified phrase. This was intended to be an ‘example’ and omitting this does not adversely impact the requirement. The modification is shown in context below:

R2.3. In determining the system’s response to a single Contingency, the following shall be acceptable<sup>2</sup>:

R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.

R2.3.2. Interruption of other network customers, only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or, if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

R2.3.3. System reconfiguration through manual or automatic control or protection actions.

**Order 705 — Section D — New Glossary Terms — Cascading (paragraphs 98–117) remands to NERC its proposed definition of “Cascading Outage”**

The drafting team does not intend to pursue a revised definition and proposes withdrawing the definition of “Cascading Outage” and using the already approved definition of “Cascading” in the revised standards.

To address this directive, the drafting team revised the capitalization in FAC-010 and FAC-011 so that the word “Cascading” is capitalized, and the word, “outage” is not capitalized to signify that the word, “Cascading” is defined term in the NERC Glossary of Terms Used in

Reliability Standards. The drafting team does not believe that use of the originally approved definition of “Cascading” will have an adverse impact on the use of these standards. The approved definition of “Cascading” is:

“The uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread electric service interruption that cannot be restrained from sequentially spreading beyond an area predetermined by studies.”

**Order 705 — Section E — Violation Risk Factors and Violation Severity Levels (paragraphs 129–179)**

Note that Order 705 also included directives relative to Violation Risk Factors and Violation Severity Levels.

The Commission directed NERC to submit nine modified and one new Violation Risk Factor (VRF) no later than 90 days before the effective date of the associated Standard (July 1, 2008 for FAC-010 and October 1, 2008 for FAC-011). The Commission identified specifically which VRFs must be changed and identified specifically what the new VRF must be and indicated that no other product is acceptable. Since the modification of these VRFs don't include an opportunity for stakeholder comment, the drafting team is not asking for comments on these modifications.

The Commission also directed that the Levels of Non-compliance be replaced with Violation Severity Levels (VSLs). The Violation Severity Levels is working to develop a set of VSLs for these standards, and the drafting team will ensure that the VSLs developed by the VSL drafting team are added to these standards once they approved by their Ballot Pool. The Commission directed WECC to replace the Levels of Noncompliance for the WECC Regional Differences in both FAC-010 and FAC-011 with VSLs, and WECC is working to develop those. Once WECC develops these VSLs using its approved process, the Levels of Noncompliance will be replaced with WECC-specific VSLs.

**Reason for Parallel Posting of SAR and Revised Standards**

Because the proposed modifications are relatively simple, and ideally they should be implemented before the first standard in the set becomes effective, the drafting team asked the Standards Committee for authorization to post both the SAR and the proposed standards at the same time. The Reliability Standards Development Procedure does allow this parallel posting, and in this case should allow the drafting team to complete its work without having to use the Urgent Action process. The goal is to have the modifications in place before July 1, 2008, which is the FERC-approved effective date for FAC-010-1.

The Facility Ratings Drafting Team would like to receive comments on the SAR and the proposed revisions to the standards. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject “FAC-010 and FAC-011” by **March 7, 2008**.

**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

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

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

Yes

No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

No

Comments:

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

Yes

No

Comments:

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

Comments:

**Comment Form for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

Please use this form to submit comments on the SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon. Comments must be submitted by **March 7, 2008**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "FAC-010 and FAC-011" in the subject line. If you have questions please contact Maureen Long at [maureen.long@nerc.net](mailto:maureen.long@nerc.net) or by telephone at 813-468-5998.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Operating Reliability Working Group (ORWG)	
Organization:	Southwest Power Pool	
Telephone:	501-614-3241	
E-mail:	rrhodes@spp.org	
NERC Region (check all Regions in which your company operates)		Registered Ballot Body Segment (check all industry segments in which your company is registered)
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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**Comment Form — Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705**

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

**Group Name:** Operating Reliability Working Group (ORWG)

**Lead Contact:** Robert Rhodes

**Contact Organization:** Southwest Power Pool

**Contact Segment:** 2

**Contact Telephone:** 501-614-3241

**Contact E-mail:** rrhodes@spp.org

Additional Member Name	Additional Member Organization	Region*	Segment*
Brian Berkstresser	Empire District Electric	SPP	1,3,5
Don Hargrove	Oklahoma Gas & Electric	SPP	1,3,5
Allen Klassen	Westar Energy	SPP	1,3
Pete Kuebeck	Oklahoma Gas & Electric	SPP	1,3,5
Scott Lockwood	American Electric Power	SPP	1,3,5
Robert Rhodes	Southwest Power Pool	SPP	2
Jim Useldinger	Kansas City Power & Light	SPP	1,3,5
Bryan Taggart	Westar Energy	SPP	5,6

\*If more than one Region or Segment applies, please list all that apply. Regional acronyms and segment numbers are shown on prior page.

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No

Comments:

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

Yes

No

Comments:

3. Do you agree with the drafting team's removal of the phrase "e.g., load greater than studied?"

Yes

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Comments:

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