

Industry Webinar

Project 2010-02 FAC Five-Year Review Project 2012-13 NUC Five-Year Review

FAC and NUC Five-Year Review Teams NERC Standards Staff August 14, 2013





It is NERC's policy and practice to obey the antitrust laws and to avoid all conduct that unreasonably restrains competition. This policy requires the avoidance of any conduct that violates, or that might appear to violate, the antitrust laws. Among other things, the antitrust laws forbid any agreement between or among competitors regarding prices, availability of service, product design, terms of sale, division of markets, allocation of customers or any other activity that unreasonably restrains competition.



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Overview of Periodic Review Process

Mallory Huggins, Standards Developer Sean Cavote, Standards Developer August 14, 2013









- Part of NERC's broader objective to transition to a clear, concise, and stable body of world-class, high-quality Reliability Standards
- Periodic reviews must be conducted on current standards that are due for assessment and have not been revised in recent standards development projects
 - Required by ANSI-accredited Reliability Standards development process



- Project 2009-03 Emergency Operations (EOP Review)
- Project 2010-02 Connecting New Facilities to the Grid (FAC Review)
- Project 2012-09 IRO Review
- Project 2012-13 NUC Review



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- Determine whether a Reliability Standard should be:
 - affirmed,
 - revised, or
 - withdrawn
- Elements of the Periodic Review
 - FERC directives
 - Stakeholder requests for clarity or revision
 - Results-Based Standards principles
 - Paragraph 81 principles





- Standard(s) identified for periodic review
- Standards Committee (SC) appoints a review team of subject matter experts (SMEs)
- SMEs develop recommendation(s) to affirm, revise, or withdraw
 - May include Standard Authorization Request (SAR) and/or redline standard
- Recommendation(s) posted for 45-day comment period
- SC considers comments and final recommendation(s)
 - Recommendations to affirm will be submitted to NERC Board of Trustees (Board) for approval
 - Recommendations to revise or retire will proceed through usual standards development process



- May/June 2013: Initial Five-Year Review Team (FYRT) meetings
 - Most conducted by conference call
- July/August 2013: Posting for industry comments
- September 2013: Final FYRT meetings
 - FYRT to review comments, finalize recommendation to SC
 - If comments indicate the need for further discussion with industry, a technical workshop will be scheduled
- September/October 2013: Recommendation presented to the SC





Questions and Answers





FAC Five-Year Review Team Recommendations

John Beck, Chair Mike Steckelberg, Vice Chair Mallory Huggins, Standards Developer August 14, 2013









- John Beck, Con Edison Chair
- Michael Steckelberg, Great River Energy Vice Chair
- Brian Dale, Georgia Power Company Member
- Ruth Kloecker, ITC Holdings Member
- Stewart Rake, Luminant Generation Company Member
- Ganesh Velummylum, NIPSCO Member
- Mallory Huggins, NERC Lead Standards Developer
- Sean Cavote, NERC Supporting Standards Developer
- Ed Dobrowolski, NERC Supporting Standards Developer
- Kumar Agarwal, FERC Observer
- Kenneth Goldsmith, PMOS Observer



- Many standards in the Facilities Design, Connection, and Maintenance (FAC) family have been modified recently, but the FAC FYRT reviewed all FAC standards together to identify opportunities for consolidation and additional improvements
- Posted Documents
 - Six recommendations:
 - o FAC-001-1
 - o FAC-002-1
 - o FAC-003-3
 - o FAC-008-3
 - o FAC-013-2
 - FAC-010-2.1, FAC-011-2, FAC-014-2
 - Draft SAR (posted for information only)
 - Chart summarizing the recommendations



FAC-001-1—Facility Connection Requirements

- Recommended Paragraph 81 Retirements
 - Remove references to "NERC Reliability Standards and applicable Regional Entity, subregional, Power Pool, and individual Transmission Owner planning criteria and Facility connection requirements" (redundant)
 - Retire most subparts under Requirement R3 (too prescriptive)
 - Retire R4 (unrelated to reliability; redundant)
- Recommended Clarifying Edits
 - $\,\circ\,$ Reconsider the use of the term "publish" in R1
 - Consider addition of references to "adjacent Transmission System(s)" in R3.1.1 and R3.1.2
 - Consider refining the Purpose statement
- Recommended Changes to Compliance Elements
 - Review Violation Risk Factors



FAC-002-1: Revise

- FAC-002-1—Coordination of Plans for New Facilities
 - Two FERC Directives:
 - Incorporate reference to TPL-004-0
 - Consider comments of various entities related to R1
 - Recommended Paragraph 81 Consideration
 - Reference to "NERC Reliability Standards and applicable Regional, subregional, Power Pool, and individual system planning criteria and facility connection requirements of the impacted systems" may also need to be removed here
 - Recommended Clarifying Edits
 - Change "Planning Authority" to "Planning Coordinator"
 - Split R1 into three requirements to add clarity and better distinguish among the required actions
 - Modify R1.1-R1.5 to read more like requirements than measurements



- FAC-003-3—Transmission Vegetation Management
 - The FYRT supports the technically justified, clear requirements that were developed by the Project 2007-07 drafting team and thoroughly vetted by industry stakeholders



FAC-008-3: Affirm

- FAC-008-3—Facility Ratings
 - Compliance Application Notices (CANs)
 - Two CANs associated with older versions of both FAC-008 and FAC-009
 - FYRT proposes that content of one CAN, a clarification of the reference to "terminal equipment," be incorporated into an updated Reliability Standard Audit Worksheet (RSAW)
 - Additional Opportunity for Clarify
 - Related to reference to Facility Ratings "provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating"



- FAC-013-2—Assessment of Transfer Capability for the Nearterm Transmission Planning Horizon
 - FAC-013-2 is clear, measurable, enforceable, and reliability-based



- FAC-010-2.1—System Operating Limits Methodology for the Planning Horizon; FAC-011-2—System Operating Limits Methodology for the Operations Horizon; FAC-014-2—Establish and Communicate System Operating Limits
 - While the FYRT is not recommending any specific revisions to the compliance elements at this time, revisions may be necessary after a thorough review in coordination with the TOP and TPL standards (once FERC acts upon those standards)
 - A separate effort is ongoing to determine whether the regional differences in FAC-010-2.1 and FAC-011-2 can be retired



NERC.com > Program Areas & Departments > Standards > Reliability Standards Development > Posted for Comment > Project 2010-02: Five-Year Review of FAC Standards

http://www.nerc.com/pa/Stand/Pages/FACFiveYearReviewTeam.aspx

Draft	Action	Dates	Results	Consideration of Comments
Recommendations for Revision	Comment Period			
Recommendation to Revise FAC-001-1	Info>>			
Recommendation to Revise FAC-002-1				
Standard Authorization Request	Submit Comments>> (FAC-001-1, FAC-002-1)	08/01/13 - 09/16/13		
Recommendations for Affirmation or Delayed Review				
Recommendation to Affirm FAC-003-3	Submit Comments>> (FAC-003-3, FAC-008-3, FAC-010-2.1,			
Recommendation to Affirm FAC-008-3	FAC-011-2, FAC-013-2, FAC-014-2)			
Recommendation to Affirm FAC-013-2				
Recommendation to Delay Review of FAC-010-2.1, FAC-011-2, and FAC-014-2				
Supporting Materials:				
Summary Chart for All FAC Recommendations				
Unofficial Comment Form (Word) for Recommendations for Revision				
Unofficial Comment Form (Word) for Recommendations for Affirmation or Delayed Review				





- September 16, 2013: Comment period ends
- September 30-October 2, 2013: FYRT will meet to review comments and refine recommendations
- October 17, 2013: Goal for submitting final recommendations to SC
- November 7, 2013: Goal for presenting to Board



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- Mallory Huggins, Standards Developer: <u>mallory.huggins@nerc.net</u>





Questions and Answers





NUC Five-Year Review Team Recommendations

John Gyrath, Chair Sean Cavote, Standards Developer August 14, 2013









- John Gyrath, Exelon Generation LLC (Nuclear) Chair
- George Attarian, Duke Energy Vice Chair
- Mukund Chander, Entergy Services Inc. Member
- Kevin Donnelly, Consolidated Edison of NY Member
- Pete Jenkins, Luminant Generation Company LLC Member
- Jerry Whooley, PJM Interconnection Member
- Les Carter, Ontario Power Generation Member
- Sean Cavote, NERC Standards Developer
- Brian Murphy PMOS
- Michael Gandolpho FERC



- The FYRT is recommending revision of NUC-002-1 to improve the clarity of the standard to support more effective implementation
- Posted Documents
 - FYRT Recommendation to Revise NUC-001-2
 - Draft SAR
 - Proposed Revisions to NUC-001-2 (in redlined format)
 - Unofficial Comment Form
 - Position Paper on NUC-001-2 R7 and R8



- Section 4.1: Add plural to "Nuclear Plant Generator Operator"
- Requirement R5: Clarify that the Nuclear Plant Generator Operator shall operate the nuclear plant to meet the Nuclear Plant Interface Requirements (provides consistency with R4)
- Requirements R7 and R8: Delete "Protection Systems" in R7 and R8 since it is a subset of the "nuclear plant design" and "electric system design" elements currently contained in R7 and R8; use of the defined term "Protection Systems" is overly broad in application to R7 and R8
- Requirement R9: Clarify that all Agreements do not have to contain each of the elements in R9, but that the aggregate of the Agreements must address all R9 elements



- Requirement R9.4.1: Clarify that the communications referred to in R9.4.1 are those that affect the Nuclear Plant Interface Requirement(s) (NIPRs)
- Measures: Revise the measures to provide examples of what constitutes "evidence" and to be provide consistent language with the Requirements
- Regional Differences: Remove reference to specific NRC regulations and clarify that there are no Canadian Regulatory requirements for electrical power from the electric network to permit safe shutdown





- www.nerc.com/pa/Stand/Pages/NUCFiveYearReviewTeam.aspx
- September 09, 2013: Comment period ends
- September 30-October 2, 2013 (tentative dates): FYRT will meet to review comments and refine recommendations
- October 17, 2013: Goal for submitting final recommendations to SC
- November 7, 2013: Goal for presenting to Board



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Questions and Answers

