# **Survey Report**

# **Survey Details**

Name 2010-07.1 Vegetation Management | FAC-003-3 SAR

Description

**Start Date** 8/24/2015

**End Date** 9/28/2015

#### **Associated Ballots**

### **Survey Questions**

1. Do you agree that the scope and objectives of the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

Yes

No

If you have any other comments on this SAR that you haven't already mentioned above, please provide them here:

# **Responses By Question**

1. Do you agree that the scope and objectives of the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

John Fontenot - Bryan Texas Utilities - 1 -			
Selected Answer:	Yes		
Answer Comment:			
Document Name:			
Likes:	0		
Dislikes:	0		
Tammy Porter - One	cor Electric Delivery - 1 - TRE		
Selected Answer:	Yes		
Answer Comment:			
Document Name:			
Likes:	0		
Dislikes:	0		
Michelle Amarantos	s - APS - Arizona Public Service Co 1 -		
Selected Answer:	Yes		
Answer Comment:			
Document Name:			
Likes:	0		
Dislikes:	0		

# Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer: Yes

Answer Comment:

**Document Name:** 

Likes: 0

Dislikes: 0

## Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

### **Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Shannon Weaver	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Brad Perrett	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6

Tony Eddleman	Nebraska Public Power District	MRO	1,3,5
Voter Information			
Voter	Segn	ent	
Emily Rousseau	1,2,3,4,5,6		
Entity	Regio	on(s)	
MRO	MRO		
Selected Answer:	Yes		
Answer Comment:	The NSRF agrees with the SAR to u findings.	pdate Table 2	2 MVCD's with the EPRI
Document Name:			
Likes:	0		
Dislikes:	0		
Amy Casuscelli - Xo	cel Energy, Inc 1,3,5,6 - MRO,WEC	C,SPP	
Selected Answer:	Yes		
Answer Comment:			
Document Name:			
Likes:	0		

Molly Devine - IDAC	CORP - Idaho Power Company - 1 -
Selected Answer:	Yes
Answer Comment:	
Document Name:	
Likes:	0
Dislikes:	0

# Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

## **Group Information**

Group Name: Dominion - RCS

<b>Group Member Name</b>	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc,	NPCC	5

#### **Voter Information**

Voter Segment

Randi Heise 5

Entity Region(s)

Dominion - Dominion Resources, Inc.

Selected Answer: Yes

**Answer Comment:** 

**Document Name:** 

Likes: 0

Thomas Foltz - AE	· - 5 -	
Selected Answer:	Yes	
Answer Comment:		
Document Name:		
Likes:	0	
Dislikes:	0	

### Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

# **Group Information**

Group Name: **Duke Energy** 

<b>Group Member Name</b>	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

#### **Voter Information**

Segment Voter

Colby Bellville 1,3,5,6

**Entity** Region(s)

**Duke Energy** FRCC,SERC,RFC

Selected Answer: Yes

**Answer Comment:** 

Duke Energy agrees with the scope and objectives of the SAR which appear to align MVCD with the empirical data stemming from the EPRI study.

**Document Name:** 

Likes: 0

# Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC

### **Group Information**

Group Name: Southern Company

<b>Group Member Name</b>	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

#### **Voter Information**

Voter Segment

Randall Hubbard 1,3,5,6

Yes

Entity Region(s)

Southern Company - Southern Company FRCC,WECC,TRE,SERC Services, Inc.

Selected Answer:
Answer Comment:

**Document Name:** 

Likes: 0

Rachel Coyne - Texas Reliability Entity, Inc. - 10 -

Selected Answer: Yes

**Answer Comment:** 

**Document Name:** 

Likes: 0

Dislikes: 0

# Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

## **Group Information**

Group Name: NPCC--Project 2010-07.1 Vegetation Management - FAC-003-3

<b>Group Member Name</b>	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5

Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Robert Pellegrini	The United Illuminating Company	NPCC	1
Kathleen Goodman	ISO - New England	NPCC	2
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Jones	National Grid	NPCC	1

### **Voter Information**

Voter Segment

Lee Pedowicz 10

Entity Region(s)

Northeast Power Coordinating Council NPCC

Selected Answer: Yes

Answer Comment:

Document Name:

Likes: 0

Dislikes:	0	

#### Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

#### **Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Robert Hirchak	Cleco Corporation	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Corporation	SPP	1
Bruce Dooley	Sunflower Electric Power Corporation	SPP	1
Kevin Giles	Westar Energy, Inc	SPP	1,3,5,6
James Nail	City of Independence, Missouri	SPP	3,5

#### **Voter Information**

Voter Segment

Shannon Mickens 2

Entity Region(s)

Southwest Power Pool, Inc. (RTO) SPP

Selected Answer: Yes

**Answer Comment:** 

We agree with the scope and objective of the SAR. However, we would suggest to the drafting team to conduct a thorough evaluation of how the Gallet Equation was used in the previous calculation of the Minimum Vegetation Clearance Distance (MVCD) and current EPRI Study. We feel this evaluation will help develop a structural value for FAC-003 and ensure all concerns have been addressed in reference to the previous and future calculations for the gap factor.

**Document Name:** 

Likes: 0

Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC

Selected Answer: Yes

**Answer Comment:** 

**Document Name:** 

Likes: 0

Dislikes: 0

## Richard Hoag - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6 - RFC

### **Group Information**

Group Name: FE RBB

<b>Group Member Name</b>	Entity	Region	Segments
William Smith	FirstenergyCorp	RFC	1
Cindy Stewart	FirstEnergy Corp.	RFC	3
Doug Hohlbaugh	Ohio Edison	RFC	4
Robert Loy	FirstEnergy Solutions	RFC	5
Richard Hoag	FirstenergyCorp	RFC	NA - Not Applicable
Ann Ivanc	FirstEnergy Solutions	FRCC	6

### **Voter Information**

Voter Segment

Richard Hoag 1,3,4,5,6

Entity Region(s)

FirstEnergy - FirstEnergy Corporation RFC

Selected Answer: Yes

**Answer Comment:** 

Yes, FE Energy Delivery -Transmission Vegetation Management agrees with the scope and objectives of the SAR.

As a result of testing conducted by EPRI, at NERC's request, the MVCD listed in Standard FAC-003-3 required to prevent a flashover and improve the reliability of the Bulk Power System (BPS) will need to be increased. The EPRI report determined "that the proposed minimum vegetation clearance distances (MVCD), based on a gap factor of 1.3, should be increased and the corresponding gap factor reduced to a more conservative value of 1.0." TVM clearances far exceed the new MVCD Table distances, therefore no objections or comments are necessary.

Document Name:	
Likes:	0
Dislikes:	0
Jennifer Losacco -	NextEra Energy - Florida Power and Light Co 1 - FRCC

Selected Answer: Yes

**Answer Comment:** 

**Document Name:** 

Likes: 0

## Ben Engelby - ACES Power Marketing - 6 -

### **Group Information**

Group Name: ACES Standards Collaborators - FAC-003 Project

<b>Group Member Name</b>	Entity	Region	Segments
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Ginger Mercier	Prairie Power Inc.	SERC	1,3
Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1

#### **Voter Information**

Voter	Segment

Ben Engelby 6

Region(s) **Entity** 

**ACES Power Marketing** 

Selected Answer: Yes

**Answer Comment:** 

We support the changes to FAC-003, as they are aligned with the directives in FERC Order No. 777.

**Document Name:** 

Likes: 0

Andrea Jessup - Bo	onneville Power Administration - 1,3,5,6 - WECC
Selected Answer:	Yes
Answer Comment:	
Document Name:	
Likes:	0
Dislikes:	0
provide them here:	r comments on this SAR that you haven't already mentioned above, please
John Fontenot - Bry	yan Texas Utilities - 1 -
Selected Answer:	
Answer Comment:	
Document Name:	
Likes:	0
Dislikes:	0

Tammy Porter - Oncor Electric Delivery - 1 - TRE				
Selected Answer:	Selected Answer:			
<b>Answer Comment:</b>				
Document Name:				
Likes:	0			
Dislikes:	0			
Michelle Amarantos	s - APS - Arizona Public Service Co 1 -			
Selected Answer:				
Answer Comment:	APS agrees with the findings of the EPRI study and supports modifications to the gap factors of the Gallet equation.			
Document Name:				
Likes:	0			
Dislikes:	0			

Andrew Pusztai - American Transmission Company, LLC - 1 -

Selected Answer:

**Answer Comment:** 

**Document Name:** 

Likes: 0

Dislikes: 0

## Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO

### **Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	Entity	Region	Segments
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Shannon Weaver	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Brad Perrett	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6

Tony Eddleman	Nebraska Public Power District	MRO	1,3,5
Voter Information			
Voter	Segn	nent	
Emily Rousseau	1,2,3,	4,5,6	
Entity	Regio	on(s)	
MRO	MRO		
Selected Answer:			
Answer Comment:	Limit the FAC-003-4 modifications to	o the Table 2 MV	CD update, only.
Document Name:			
Likes:	0		
Dislikes:	0		
Amy Casuscelli - Xo	cel Energy, Inc 1,3,5,6 - MRO,WEC	C,SPP	
Selected Answer:			
Answer Comment:			
Document Name:			
Librari	0		
Likes:	0		
Dislikes:	0		

Molly Devine - ID	ACORP - Idaho Power Co	mpany - 1 -			
Selected Answe	Selected Answer:				
Answer Comme	nt:				
Document Name	y:				
Likes:	0				
Dislikes:	0				

### Randi Heise - Dominion - Dominion Resources, Inc. - 5 -

#### **Group Information**

Group Name: Dominion - RCS

<b>Group Member Name</b>	Entity	Region	Segments
Larry Nash	Dominion Virginia Power	SERC	1
Louis Slade	Dominion Resources, Inc.	SERC	6
Connie Lowe	Dominion Resources, Inc.	RFC	3
Randi Heise	Dominion Resources, Inc,	NPCC	5

#### **Voter Information**

Voter Segment

Randi Heise 5

Entity Region(s)

Dominion - Dominion Resources, Inc.

#### **Selected Answer:**

#### **Answer Comment:**

Page 2 - under Detailed Description; Dominion suggests the last sentence which says; "The drafting team will be modifying the standard based on the final report, which is scheduled to be released in July 2015." be updated to reflect when the final report was released (July 2015 has past).

#### **Document Name:**

Likes: 0

Thomas Foltz - AE	EP - 5 -				
Selected Answer:	elected Answer:				
Answer Comment	::				
Document Name:					
Likes:	0				
Dislikes:	0				

# Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC

## **Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

### **Voter Information**

Voter Segment

Colby Bellville 1,3,5,6

Entity Region(s)

Duke Energy FRCC,SERC,RFC

Selected Answer:

**Answer Comment:** 

**Document Name:** 

Likes: 0

# Randall Hubbard - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - FRCC,WECC,TRE,SERC

### **Group Information**

Group Name: Southern Company

<b>Group Member Name</b>	Entity	Region	Segments
Robert Schaffeld	Southern Company Services, Inc	SERC	1
John Ciza	Southern Company Generation and Energy Marketing	SERC	6
R. Scott Moore	Alabama Power Company	SERC	3
William Shultz	Southern Company Generation	SERC	5

#### **Voter Information**

Voter	Segment

Randall Hubbard 1,3,5,6

Entity Region(s)

Southern Company - Southern Company FRCC,WECC,TRE,SERC Services, Inc.

**Selected Answer:** 

**Answer Comment:** 

**Document Name:** 

Likes: 0

Rachel Coyne - Texas	Reliability	Entity,	Inc.	- 10 -
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Selected Answer:

**Answer Comment:** 

**Document Name:** 

Likes: 0

Dislikes: 0

# Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

### **Group Information**

Group Name: NPCC--Project 2010-07.1 Vegetation Management - FAC-003-3

<b>Group Member Name</b>	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5

Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Robert Pellegrini	The United Illuminating Company	NPCC	1
Kathleen Goodman	ISO - New England	NPCC	2
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Michael Jones	National Grid	NPCC	1

## **Voter Information**

Voter Segment

Lee Pedowicz 10

Entity Region(s)

Northeast Power Coordinating Council NPCC

Selected Answer:

**Answer Comment:** 

On page 2 of the SAR the last sentence under Detailed Description reads:

"The drafting team will be modifying the standard based on the final report, which is scheduled to be released in July 2015."

This sentence should be revised to reflect the actual release date of the final report (August 15, 2015 from the NERC Website).

NERC's May 14, 2015 Industry Advisory FAC-003-3 Minimum Vegetation Clearance Distances (MVCD) refers to "alternating current system voltages..." Was any testing done for high voltage DC voltages? The report apparently refers to only AC voltages. The SAR should stipulate this. What is the intention for addressing HVDC clearances?

The SAR should address a flexible Vegetation Control Cycle based on historic vegetation inspections from each area.

#### **Document Name:**

Likes: 0

## Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP

## **Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool Inc.	SPP	2
Jason Smith	Southwest Power Pool Inc	SPP	2
Robert Hirchak	Cleco Corporation	SPP	1,3,5,6
Tara Lightner	Sunflower Electric Power Corporation	SPP	1
Bruce Dooley	Sunflower Electric Power Corporation	SPP	1
Kevin Giles	Westar Energy, Inc	SPP	1,3,5,6
James Nail	City of Independence, Missouri	SPP	3,5

### **Voter Information**

oter	Segme
ter	o <del>c</del> y.

Shannon Mickens 2

Entity Region(s)

Southwest Power Pool, Inc. (RTO) SPP

**Selected Answer:** 

**Answer Comment:** 

**Document Name:** 

Likes: 0

Dennis Chasta	ain - Tennesse	e Valley Autho	rity - 1,3,5,6 - S	SERC	
Selected Answer:					
Answer Comn	nent:				
Document Na	me:				
Likes:	0				
Dislikes:	0				

# Richard Hoag - FirstEnergy - FirstEnergy Corporation - 1,3,4,5,6 - RFC

### **Group Information**

Group Name: FE RBB

<b>Group Member Name</b>	Entity	Region	Segments
William Smith	FirstenergyCorp	RFC	1
Cindy Stewart	FirstEnergy Corp.	RFC	3
Doug Hohlbaugh	Ohio Edison	RFC	4
Robert Loy	FirstEnergy Solutions	RFC	5
Richard Hoag	FirstenergyCorp	RFC	NA - Not Applicable
Ann Ivanc	FirstEnergy Solutions	FRCC	6

#### **Voter Information**

VoterSegmentRichard Hoag1,3,4,5,6

Entity Region(s)

FirstEnergy - FirstEnergy Corporation RFC

Selected Answer:

**Answer Comment:** 

**Document Name:** 

Likes: 0

Jennifer Losacco - NextEra Energy - Florida Power and Light Co 1 - FRCC
Selected Answer:
Answer Comment:
Document Name:

Likes: 0

Dislikes: 0

# Ben Engelby - ACES Power Marketing - 6 -

## **Group Information**

Group Name: ACES Standards Collaborators - FAC-003 Project

<b>Group Member Name</b>	Entity	Region	Segments
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
Ginger Mercier	Prairie Power Inc.	SERC	1,3
Mohan Sachdeva	Buckeye Power, Inc.	RFC	4
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1

### **Voter Information**

Voter Segment

Ben Engelby 6

Entity Region(s)

**ACES Power Marketing** 

**Selected Answer:** 

Answer Comment:	We would appreciate guidance regarding compliance with Table 2 in the interim while the proposed revisions of this SAR go through the development process and eventually approved by FERC and becomes enforceable. FAC-003-2 requires that the MVCDs utilize a gap factor of 1.3, which is the current enforceable standard. Is there going to be a change in compliance monitoring approaches prior to the issuance of FAC-003-4? Any additional information relating to the NERC Advisory and how it relates to compliance with the standard would be helpful.
	Thank you for the opportunity to comment.
Document Name:	
Likes:	0
Dislikes:	0
Andrea Jessup - Bo	onneville Power Administration - 1,3,5,6 - WECC
Selected Answer:	
Answer Comment:	
Document Name:	
Likes:	0
Dislikes:	0