

## Comment Report

**Project Name:** 2015-09 Establish and Communicate System Operating Limits | FAC-014-3  
**Comment Period Start Date:** 2/19/2021  
**Comment Period End Date:** 4/5/2021  
**Associated Ballots:** 2015-09 Establish and Communicate System Operating Limits FAC-014-3 AB 5 ST

There were 43 sets of responses, including comments from approximately 122 different people from approximately 93 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## Questions

1. The SDT made revisions to FAC-014-3 in response to comments, namely with the inclusion of time horizons on the subparts of R5 and an annual reporting requirement in R5.6. Do you agree with the revisions? If not, please explain why.
2. The SDT received numerous comments regarding whether CIP-002.5.1a should be revised based upon the drafting team's revisions to FAC-011 and FAC-014. The SDT is not revising CIP-002.5.1a and provided a rationale document describing its reasoning with this posting. Do you agree with not revising CIP-002.5.1a and the reasoning provided? If not, please explain why?
3. If you have any other comments regarding FAC-014-3 that you haven't already provided, please provide them here.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
New York Independent System Operator	Gregory Campoli	2		ISO/RTO Standards Review Committee	Gregory Campoli	New York Independent System Operator	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Del Viscio	PJM	2	RF
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Bobbi Welch	Midcontinent ISO, Inc.	2	RF
					Ali Miremadi	CAISO	2	WECC
					Kahtleen Goodman	ISO-NE	2	NPCC
Jennie Wike	Jennie Wike		WECC	Tacoma Power	Jennie Wike	Tacoma Public Utilities	1,3,4,5,6	WECC
					John Merrell	Tacoma Public Utilities (Tacoma, WA)	1	WECC
					Marc Donaldson	Tacoma Public Utilities (Tacoma, WA)	3	WECC
					Hien Ho	Tacoma Public Utilities (Tacoma, WA)	4	WECC
					Terry Gifford	Tacoma Public Utilities (Tacoma, WA)	6	WECC
					Ozan Ferrin	Tacoma Public Utilities (Tacoma, WA)	5	WECC
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NA - Not Applicable,RF,SERC,Texas RE,WECC	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO

					Bill Hutchison	Southern Illinois Power Cooperative	1	SERC
					David Hartman	Arizona Electric Power Cooperative	1	WECC
					Susan Sosbe	Wabash Valley Power Association	3	RF
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
MRO	Kendra Buesgens	1,2,3,4,5,6	MRO	MRO NSRF	Bobbi Welch	Midcontinent ISO, Inc.	2	MRO
					Christopher Bills	City of Independence Power & Light	4	MRO
					Fred Meyer	Algonquin Power Co.	1	MRO
					Jamie Monette	Allete - Minnesota Power, Inc.	1	MRO
					Jodi Jensen	Western Area Power Administration - Upper Great Plains East (WAPA)	1,6	MRO
					John Chang	Manitoba Hydro	1,3,6	MRO
					Larry Heckert	Alliant Energy Corporation Services, Inc.	4	MRO
					Marc Gomez	Southwestern Power Administration	1	MRO
					Matthew Harward	Southwest Power Pool, Inc.	2	MRO
					LaTroy Brumfield	American Transmission	1	MRO

						Company, LLC		
					Bryan Sherrow	Kansas City Board Of Public Utilities	1	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO
					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Seth Shoemaker	Muscatine Power & Water	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1,3,5	MRO
					Joe DePoorter	Madison Gas and Electric	4	MRO
					David Heins	Omaha Public Power District	1,3,5,6	MRO
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC,Texas RE	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Ann Carey	FirstEnergy - FirstEnergy Solutions	6	RF
					Mark Garza	FirstEnergy-FirstEnergy	4	RF
Southern Company - Southern Company Services, Inc.	Pamela Hunter	1,3,5,6	SERC	Southern Company	Matt Carden	Southern Company - Southern Company Services, Inc.	1	SERC

					Joel Dembowski	Southern Company - Alabama Power Company	3	SERC
					Ron Carlsen	Southern Company - Southern Company Generation	6	SERC
					Jim Howell	Southern Company - Southern Company Services, Inc. - Gen	5	SERC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Helen Lainis	IESO	2	NPCC
					David Kiguel	Independent	7	NPCC
					Nick Kowalczyk	Orange and Rockland	1	NPCC
					Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
					Mike Cooke	Ontario Power Generation, Inc.	4	NPCC

Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Cristhian Godoy	Con Ed - Consolidated Edison Co. of New York	6	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Nurul Abser	NB Power Corporation	1	NPCC
Randy MacDonald	NB Power Corporation	2	NPCC
Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC
Vijay Puran	NYSPS	6	NPCC
ALAN ADAMSON	New York State Reliability Council	10	NPCC
Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
Brian Robinson	Utility Services	5	NPCC
Quintin Lee	Eversource Energy	1	NPCC
Jim Grant	NYISO	2	NPCC

					John Pearson	ISONE	2	NPCC
					John Hastings	National Grid USA	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
					Chantal Mazza	Hydro-Quebec	2	NPCC
					Michele Tondalo	United Illuminating Co.	1	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC



1. The SDT made revisions to FAC-014-3 in response to comments, namely with the inclusion of time horizons on the subparts of R5 and an annual reporting requirement in R5.6. Do you agree with the revisions? If not, please explain why.

**LaTroy Brumfield - American Transmission Company, LLC - 1**

**Answer** No

**Document Name**

**Comment**

In reviewing the language for requirement R5.4, the focus is on the Operational Planning Analysis, which NERC defines as a next day analysis. Given the NERC time horizon definitions ([https://www.nerc.com/pa/Stand/Resources/Documents/Time\\_Horizons.pdf](https://www.nerc.com/pa/Stand/Resources/Documents/Time_Horizons.pdf)), the only applicable time horizon appears to be Operations Planning since Same-day Operations applies to “the timeframe of a day” and Real-time Operations applies to “one hour or less”. In the alternative, if the drafting team believes these time horizons do apply, we recommend that the team update the rationale requirements document to explain how these other time horizons apply to the OPA.

Likes 0

Dislikes 0

**Response**

**Scott Miller - Scott Miller On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Scott Miller**

**Answer** No

**Document Name**

**Comment**

Regarding the annual reporting requirement, Southern thinks it would be more appropriate to provide the information initially and then provide information as it changes, such as “within 90 days of a change.” Southern suggests that would be true for all of R5, not just R5.6.

Likes 0

Dislikes 0

**Response**

**Marty Hostler - Northern California Power Agency - 3,4,5,6**

**Answer** No

**Document Name**

**Comment**

The standard is not results-based.

Unfortunately, this project is six years old and needs to end.

Likes 0

Dislikes 0

### Response

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

No

**Document Name**

**Comment**

Southern Company believes it is more appropriate to provide information initially and then provide information within a certain prescribed timeframe as the information changes. Several changes could occur within the annual period and users would not have the most up to date information. Additionally, the annual update is unnecessary if the information does not change.

The addition of the "Time Horizon" in R5.1-R5.6 does not provide useful clarification as R5 already indicates the applicable time horizons. Not only does this introduce un-necessary confusion for the RC in addressing the requirements, it appears to limit the flexibility in providing the SOL/IROL information the RC deems appropriate. For instance, it appears the RC is limited in R5.1 and R5.2 to only provide SOLs/IROLs identified in the Operations Planning time fame. Southern recommends removing the addition of the "Time Horizons" in R5.1-R5.6.

Likes 0

Dislikes 0

### Response

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5**

**Answer**

No

**Document Name**

**Comment**

See comments from Southern Company.

Likes 0

Dislikes 0

### Response

**Richard Jackson - U.S. Bureau of Reclamation - 1**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
none	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Evergy incorporates by reference and supports Edison Electric Institute's response to Question 1.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jamie Johnson - California ISO - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
CAISO agrees with comments submitted by the ISO/RTO Council (IRC) Standards Review Committee.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Leonard Kula - Independent Electricity System Operator - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

N/A.

Likes 0

Dislikes 0

**Response****Wayne Guttormson - SaskPower - 1****Answer**

Yes

**Document Name****Comment**

Support the MRO NSRF comments.

Likes 0

Dislikes 0

**Response****David Jendras - Ameren - Ameren Services - 3****Answer**

Yes

**Document Name****Comment**

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

**Response****Larry Heckert - Alliant Energy Corporation Services, Inc. - 4****Answer**

Yes

**Document Name****Comment**

Alliant Energy supports the comments submitted by the MRO NSRF.

Likes 0

Dislikes 0

**Response**

**Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable**

**Answer**

Yes

**Document Name**

**Comment**

EEI supports the inclusion of “at least once every 12 months” to Requirement R5, Part 5.6, as well as the addition of Time Horizons to the various parts of Requirement R5.

Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**

**Answer**

Yes

**Document Name**

**Comment**

On behalf of Exelon (Segments 1, 3, 5, 6)

Exelon concurs with the comments submitted by the EEI.

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee**

**Answer**

Yes

**Document Name**

**Comment**

We support the revisions made by the SDT to FAC-014-3.

Likes 0

Dislikes 0

**Response**

**Gregory Campoli - New York Independent System Operator - 2, Group Name** ISO/RTO Standards Review Committee

**Answer**

Yes

**Document Name**

**Comment**

The IRC SRC appreciates the clarification made by the SDT to the language and applicable Time Horizons in Part 5.6 to specify “at least once every twelve calendar months.” This timeframe should allow sufficient analysis to document IROLs that will persist and need monitoring by the Reliability Coordinator and any necessary action by asset owners, per CIP standards.

Likes 0

Dislikes 0

**Response**

**Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

Yes

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Bruce Reimer - Manitoba Hydro - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike, Group Name Tacoma Power**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Laura Nelson - IDACORP - Idaho Power Company - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC**

**Answer** Yes

**Document Name**

**Comment**



Likes 0

Dislikes 0

**Response**

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**James Baldwin - Lower Colorado River Authority - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gladys DeLaO - CPS Energy - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**sean erickson - Western Area Power Administration - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Robert Stevens - CPS Energy - 1,3,5**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Teresa Krabe - Lower Colorado River Authority - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Daniela Atanasovski - APS - Arizona Public Service Co. - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Truong Le - Truong Le On Behalf of: Aaron Casto, Florida Municipal Power Pool, 6; Dale Ray, Florida Municipal Power Agency, 6, 4, 5, 3; - Truong Le</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	

Likes 0

Dislikes 0

**Response**

**Aidan Gallegos - PNM Resources - Public Service Company of New Mexico - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

2. The SDT received numerous comments regarding whether CIP-002.5.1a should be revised based upon the drafting team's revisions to FAC-011 and FAC-014. The SDT is not revising CIP-002.5.1a and provided a rationale document describing its reasoning with this posting. Do you agree with not revising CIP-002.5.1a and the reasoning provided? If not, please explain why?

**Truong Le - Truong Le On Behalf of: Aaron Casto, Florida Municipal Power Pool, 6; Dale Ray, Florida Municipal Power Agency, 6, 4, 5, 3; - Truong Le**

**Answer** No

**Document Name**

**Comment**

Support Texas RE's comments.

Likes 0

Dislikes 0

**Response**

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

**Answer** No

**Document Name**

**Comment**

Texas RE does not agree with not revising CIP-002-5.1. First, Texas RE notes that while PCs and TPs were removed from identifying IROLs in FAC-014, CIP-002 and CIP-014 still reference the PCs and TPs identifying Interconnection Reliability Operating Limits (IROLs). Second, since the RC does not have a timeframe for identifying SOLs, there could be a gap in that CIP protections may not occur for up to 24 months in accordance with the CIP-002-5.1 Implementation Plan.

Section 2.6 of the Impact Criteria of CIP-002-5.1, states that the PC and TP identify generation that is critical to the derivation of IROLs. Section 4.1.1.3 of the Applicability section of CIP-014-2 does this as well. However, FAC-014-3 removed the requirements for the PC and TP to establish IROLs. While the SDT indicates that PCs and TPs may continue to conduct planning assessments and provide Corrective Action Plans (CAPs) to address identified system deficiencies to their RCs, there ultimately is no definitive obligation within the NERC Reliability Standards for PCs and TPs to explicitly identify generation critical to the derivation of IROLs. From Texas RE's perspective, this results in reliability gaps because the TPL-001 planning assessment process does not explicitly incorporate the specific IROL derivation reliability task.

Texas RE believes that this gap has important consequences for the timing of the identification of IROLs and the corresponding implementation of CIP controls. Given that the TPs and PCs were removed from establishing IROLs in FAC-014-3, no identity is explicitly responsible for identifying IROLs in the planning horizon. Texas RE recommends explicitly keeping the TPs and PCs involved with this process in CIP-002 and CIP-014. Having the PCs and TPs conduct this analysis in the planning horizon many months or years prior to the IROL being established allows time for the generation and Transmission Facilities to establish CIP protections on the IROL.

Since FAC-014-3 does not include a time-frame specified for the RC to establish IROLs and no studies are required by the RC until a day prior to Real-time operations (OPA), the RC may not identify these Facilities before that point. Since the implementation plan for CIP-002-5.1 allows for an implementation period of 12 or 24 months depending on the scenario, this could result in a Facility that is determined to be critical to the derivation of an IROL not having adequate cyber and physical security controls for a period of up to 24 months.

This could be resolved by revising the impact criteria in CIP-002 and the applicability in CIP-014. In section 2.6 of the impact criteria for CIP-002, Texas RE recommends removing the reference to PCs and TPs, as they are no longer involved with identifying IROLs per FAC-14-3. Texas RE further recommends adding an additional criterion with the following verbiage: *Facilities identified by the Planning Coordinator or Transmission Planner, per its Planning Assessment of the Near-Term Transmission Planning Horizon or its Transfer Capability Assessment (Planning Coordinator only) as a Facility that if lost or degraded are expected to result in instances of instability, Cascading, or uncontrolled separation.* This verbiage is consistent with the applicability section of FAC-003-5.

In CIP-014, Texas RE recommends revising section 4.1.1.3 of the Applicability to: *Facilities identified by the Planning Coordinator or Transmission Planner, per its Planning Assessment of the Near-Term Transmission Planning Horizon or its Transfer Capability Assessment (Planning Coordinator only) as a Facility that if lost or degraded are expected to result in instances of instability, Cascading, or uncontrolled separation.*

These changes would explicitly allow for the PC and TPs to be involved with identifying Facilities that if lost or degraded are expected to result in instances of instability, Cascading, or uncontrolled separation. Doing this in the planning horizon will allow for the identified Facilities to establish CIP protections much earlier in the process, reducing the potential reliability issues posed by such critical Facilities.

Likes 0

Dislikes 0

### Response

**Bruce Reimer - Manitoba Hydro - 1**

**Answer**

No

**Document Name**

**Comment**

We agree that the CIP-002.5.1a criterion 2.6 can be retained without changes, but the Guidelines and Technical Basis as part of CIP-002-5.1a standard will need to be updated to reflect and align with FAC-014 R5 changes (see references cited for Criterion 2.6 at the bottom of page 25 and page 28 of CIP-002.5.1a). Without this linkage, Generator Owners or Transmission Owner receiving information pursuant to FAC-014-3 for the first time may fail to make the correlation to CIP-002-5.1a resulting in missing the identification of medium impact BES Facilities.

Likes 0

Dislikes 0

### Response

**Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2**

**Answer** Yes

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee**

**Answer** Yes

**Document Name**

**Comment**

We support the SDT not revising CIP-002-5.1a.

Likes 0

Dislikes 0

**Response**

**Daniel Gacek - Exelon - 1**



<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
On behalf of Exelon (Segments 1, 3, 5, 6)	
Exelon concurs with the comments submitted by the EEI.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
EEI supports the arguments contained in the Technical Rationale document titled "Technical Rationale for Exclusion of CIP Criteria Modifications by Project 2015-09" which addresses why there are no reliability gaps resulting from the retirement of FAC-010.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Larry Heckert - Alliant Energy Corporation Services, Inc. - 4</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Alliant Energy supports the comments submitted by the MRO NSRF.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>David Jendras - Ameren - Ameren Services - 3</b>	

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Ameren agrees with and supports EEI comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Wayne Guttormson - SaskPower - 1</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Support the MRO NSRF comments.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Leonard Kula - Independent Electricity System Operator - 2</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
N/A.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Marty Hostler - Northern California Power Agency - 3,4,5,6</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

CIP-002.5.1.a was already revised, vetted by industry and by NERC, approved by all, then submitted to FERC. Recently NERC withdrew it.

The CIP virtualization project is also modifying it. Very confusing. Please no more changes.

Likes 0

Dislikes 0

**Response**

**Jamie Johnson - California ISO - 2**

**Answer**

Yes

**Document Name**

**Comment**

CAISO agrees with comments submitted by the ISO/RTO Council (IRC) Standards Review Committee.

Likes 0

Dislikes 0

**Response**

**Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb**

**Answer**

Yes

**Document Name**

**Comment**

Evergy incorporates by reference and supports Edison Electric Institute's response to Question 2.

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1**

**Answer**

Yes

**Document Name**

**Comment**

none

Likes 0

Dislikes 0

**Response**

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aidan Gallegos - PNM Resources - Public Service Company of New Mexico - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Daniela Atanasovski - APS - Arizona Public Service Co. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Teresa Krabe - Lower Colorado River Authority - 5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Robert Stevens - CPS Energy - 1,3,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**sean erickson - Western Area Power Administration - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Gladys DeLaO - CPS Energy - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**James Baldwin - Lower Colorado River Authority - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jamie Monette - Allete - Minnesota Power, Inc. - 1**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

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

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Scott Miller - Scott Miller On Behalf of: David Weekley, MEAG Power, 3, 1; Roger Brand, MEAG Power, 3, 1; - Scott Miller**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC**



Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes	0
Dislikes	0
<b>Response</b>	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes	0

Dislikes 0

**Response**

**LaTroy Brumfield - American Transmission Company, LLC - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Ozan Ferrin, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike, Group Name Tacoma Power**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC**

<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

3. If you have any other comments regarding FAC-014-3 that you haven't already provided, please provide them here.

**Matthew Nutsch - Seattle City Light - 1,3,4,5,6 - WECC**

**Answer**

**Document Name**

**Comment**

Nothing to add

Likes 0

Dislikes 0

**Response**

**Kim Thomas - Duke Energy - 1,3,5,6 - SERC,RF, Group Name Duke Energy**

**Answer**

**Document Name**

**Comment**

None.

Likes 0

Dislikes 0

**Response**

**Thomas Foltz - AEP - 5**

**Answer**

**Document Name**

**Comment**

AEP has expressed its concerns in previous comment periods regarding the proposed revisions to FAC-014. A majority of those concerns and comments still stand and will not be restated again in their entirety in this current comment period. We would, however, like to offer the following thoughts and suggestions for consideration.

AEP thanks the drafting team for clarification on the meaning of "stability criteria" within R6. However, we find no reason why stability criteria consisting of acceptable power swing damping level, transient voltage dip and recovery durations, the necessity for the system to remain stable, and contingency definitions used in studies to evaluate stability would be any different in operations versus planning time-frames. We believe that the practical effect of including stability criteria in R6 will be to produce unnecessary administrative paperwork.

While we are somewhat encouraged that future consideration might be given to moving R6, R7 and R8 into TPL-001, we do remain concerned by the inference that this “move” might not happen until \*after\* these three requirements are first placed within FAC-014. We believe efforts to pursue such changes should be dealt with \*only\* as part of revising TPL-001, rather than \*moving\* them from FAC-014 to TPL-001 sometime in the future. As previously stated, rather than pursuing such changes within FAC-014, AEP recommends removing “stability criteria” from the proposed R6 and transferring the proposed R6, R7 and R8 over to a TPL-001 Standards Drafting Team. While well intentioned, we believe the Project 2015-09 Standards Drafting Team is unintentionally encroaching on the TPL domain by proposing such requirements be placed within FAC-014. These requirements are best served if drafted and reviewed from a Transmission Planner perspective, as these individuals would be in the best position to properly evaluate their necessity in view of the potential for nullification, or by possible reliance on operational actions and system adjustments not considered corrective action plans.

In closing, while AEP has once again chosen to vote negative as driven by the concerns stated above, we appreciate the efforts of the standards drafting team, and we envision potentially supporting such an effort provided a) “stability criteria” is removed from the proposed R6 and b) by dealing with R6, R7, and R8 solely within a project to revise TPL-001.

Likes 0

Dislikes 0

### Response

**Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter**

**Answer**

**Document Name**

**Comment**

N/A

Likes 0

Dislikes 0

### Response

**Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Eversource, 6, 1, 3, 5; Derek Brown, Eversource, 6, 1, 3, 5; Marcus Moor, Eversource, 6, 1, 3, 5; Thomas ROBBEN, Eversource, 6, 1, 3, 5; - Douglas Webb**

**Answer**

**Document Name**

**Comment**

Eversource incorporates by reference and supports Edison Electric Institute's response to Question 3.

Likes 0

Dislikes 0

### Response

**Jamie Johnson - California ISO - 2**

**Answer**

**Document Name**

**Comment**

The CAISO Planning Coordinator recommends the following changes to the draft FAC-014-3 :

&bull; Requirements R6 to R8 be removed from FAC-014-3.

&bull; Requirement R6 is misplaced and should be addressed in TPL-001, which governs Planning Assessments, rather than in FAC-014-3. Keeping “like” requirements together in one standard will avoid inconsistency, retain the overall context of the requirements, increase efficiency, and avoid undue regulatory burden.

&bull; Requirement R7 is also misplaced and should be addressed in TPL-001, which governs Planning Assessments, rather than in FAC-014-3. The comment above regarding keeping like requirements together applies here as well.

&bull; Requirement R8 should be removed from FAC-014-3 because FAC-014-3 makes the Reliability Coordinator (RC) the sole functional entity that establishes IROLs. As such, the PC and the TP that no longer establish IROLs should not be required to provide facilities that are critical to the derivation of IROLs and their contingencies to the impacted Transmission Owner (TO) and Generation Owner (GO) in accordance with CIP-002, CIP-014, etc. Requirement R5.6, which requires the RC to provide such information to the impacted TO and GO, should be sufficient to address their IROL-related needs. If the SDT determines there is Planning Assessment related information that the PC and TP should provide to the TO and GO, the requirement should be addressed in TPL-001 that governs their Planning Assessment, rather than in FAC-014, to keep like requirements together. Also, because TPL-001 does not allow planning event Contingency(ies) to cause instability, Cascading or uncontrolled separation that adversely impacts the reliability of the BES, Requirement R8 is inconsistent with TPL-001.

&bull; The phrase “ and that Planning Assessment performance criteria is coordinated with these methodologies.” be removed from the Purpose (Section 3) of FAC-014-3.

&bull; The Planning Coordinator and the Transmission Planner be removed from the Applicability Section (Section 4).

Likes 0

Dislikes 0

**Response**

**Michael Jones - National Grid USA - 1**

**Answer**

**Document Name**

**Comment**

RE: R5.2.4 The associated **critical** Contingency(ies): We request the Standard Drafting Team clarify the use of the word “critical” to describe Contingency(ies)” noting that “**critical** Contingency(ies)” is undefined and opens Requirement R5, subpart 5.2.4 to interpretation.

Please consider revising the subparts of 5.2 (Requirement R5) as follows:

- 5.2.1 The value of the stability limit or IROL;
- 5.2.2 The associated IROL Tv for any IROL;
- 5.2.3 **Identification of the Facilities that are critical to the derivation of the stability limit or the IROL and the associated Contingency(ies);**
- 5.2.4 A description of system conditions associated with the stability limit or IROL; and
- 5.2.5 The type of limitation represented by the stability limit or IROL (e.g., voltage collapse, angular stability).

Likes 0

Dislikes 0

**Response**

**Kendra Buesgens - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF**

**Answer**

**Document Name**

**Comment**

**Comments:**

- · Suggest the coordination of methodologies, limits, criteria, etc, by the RC with the PC/TP should occur earlier in the RC's process.
  - · Suggest the RC should be requesting review and comments from the PC/TP.
- o The RC should align as much as possible with the PC/TP's criteria as the PC/TP determines what adequate investment into the system is.

Likes 0

Dislikes 0

**Response**

**Andy Fuhrman - Andy Fuhrman On Behalf of: Theresa Allard, Minnkota Power Cooperative Inc., 1; - Andy Fuhrman**

**Answer**

**Document Name**

**Comment**

MPC supports MRO NERC Standards Review Forum comments.

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric**

<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
not at this time, thank you.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Marty Hostler - Northern California Power Agency - 3,4,5,6</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Let move foward with the Standards Efficiency Review Porject to get rid of non Results based Standards, redunancy in Standards, and inefficiencies.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Steven Taddeucci - NiSource - Northern Indiana Public Service Co. - 3</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
No comments	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Leonard Kula - Independent Electricity System Operator - 2</b>	
<b>Answer</b>	
<b>Document Name</b>	



**Comment**

N/A.

Likes 0

Dislikes 0

**Response****Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations****Answer****Document Name****Comment**

Thank you for the opportunity to provide comments.

Likes 0

Dislikes 0

**Response****Jamie Monette - Allete - Minnesota Power, Inc. - 1****Answer****Document Name****Comment**

Minnesota Power agrees with MRO's NERC Standards Review Forum's (NSRF) comments.

Likes 0

Dislikes 0

**Response****Gladys DeLaO - CPS Energy - 1****Answer****Document Name****Comment**

CPS Energy does not have any comments.

Likes 0

Dislikes 0

**Response**

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

**Answer**

**Document Name**

**Comment**

Texas RE does not have additional comments.

Likes 0

Dislikes 0

**Response**

**Wayne Guttormson - SaskPower - 1**

**Answer**

**Document Name**

**Comment**

Support the MRO NSRF comments.

Likes 0

Dislikes 0

**Response**

**sean erickson - Western Area Power Administration - 1**

**Answer**

**Document Name**

**Comment**

Requirement R6 is confusingly written, mainly because it confuses the concept of "criteria" and the use of components of criteria.

Each Planning Coordinator and each Transmission Planner shall implement a documented process to use Facility Ratings, System steady-state voltage

limits and stability criteria in its Planning Assessment of Near Term Transmission Planning Horizon that are equally limiting or more limiting than the Facility Ratings, System Voltage Limits and/or stability **criteria used**, as described in its respective Reliability Coordinator's SOL methodology.

Likes 0

Dislikes 0

**Response**

**Daniela Atanasovski - APS - Arizona Public Service Co. - 1**

**Answer**

**Document Name**

**Comment**

None

Likes 0

Dislikes 0

**Response**

**David Jendras - Ameren - Ameren Services - 3**

**Answer**

**Document Name**

**Comment**

Ameren agrees with and supports EEI comments.

Likes 0

Dislikes 0

**Response**

**Larry Heckert - Alliant Energy Corporation Services, Inc. - 4**

**Answer**

**Document Name**

**Comment**

Alliant Energy supports the comments submitted by the MRO NSRF.

Likes 0

Dislikes 0

### Response

**Aidan Gallegos - PNM Resources - Public Service Company of New Mexico - 1**

**Answer**

**Document Name**

**Comment**

Changes to R6-R8 may be perceived as an attempt of the SDT to modify TPL-001 and MOD-032. In addition, the proposed changes to FAC-014-3 appears to be an attempt to possibly require additional information and additional coordination between operations and planning. If the SDT feels strongly that these modifications to TPL-001 and MOD-032 are required to support the reliable operation of the BES Facilities, it may be of benefit of the SDT to submit a SAR for TPL-001 and MOD-032 instead of spreading the requirement out across multiple standards.

Likes 0

Dislikes 0

### Response

**Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee**

**Answer**

**Document Name**

**Comment**

The IRC continues to believe that the drafting team should be given the opportunity to address efficiencies identified by the Standards Efficiency Review Project to reduce redundancy in the requirements and exposure to double jeopardy. FAC-013-3 R7 proposed to annually share CAP's with RC's and TOP's. IRO-017 R3 already has the requirement to share the CAP's with RC's. FAC-014-3, continues to say what should be included in that CAP, while TPL-001-4 R2.7 provides the initial requirement for completing a CAP and what should be included.

The IRC SRC continues to believe that the following additional changes to the language in the requirement:

- FAC-011-4 uses the phrase, "System Voltage Limits" (see FAC-011-4 R3). FAC-014 R6 uses a mix of terms such as "System steady state voltage limits" as well as "System Voltage Limits". The IRC SRC recommends that consistent terminology be used across these standards.
- FAC-011-4 uses the phrases, "stability limits", and "stability performance criteria" (see FAC-011-4 R4). FAC-014 R6 uses a mix of terms such as "stability criteria" or just "stability". The IRC SRC recommends that consistent terminology be used across these standards.

In addition, the IRC SRC continues to recommend that the following change be made to R6 to clarify the intent of the requirement:

R6. Each Planning Coordinator and each Transmission Planner shall implement a documented process to use Facility Ratings, System steady state Voltage Limits and stability criteria in its Planning Assessment of the Near Term Transmission Planning Horizon that are equally limiting or more limiting than the the criteria **for the use** of Facility Ratings, System Voltage Limits and stability criteria described in its respective Reliability Coordinator's SOL methodology.

The IRC continues to believe there is confusion with in this requirement. Facility Ratings are provided by asset owners. Is that the case for System Voltage Limits as well.

Finally, from a proofreading perspective, the IRC SRC notes there is an incomplete sentence (located as the last sentence in paragraph 2) on page 6 of the **Technical Rationale for Reliability Standard FAC-014-3** : "Those IROLs which may manifest in real time, due to forced outage..." that needs to be completed or deleted.

Likes 0

Dislikes 0

### Response

#### Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

##### Answer

##### Document Name

##### Comment

BPA continues to be concerned that the Technical Rationale document is apart from the Standard. There appears to be risks associated with this approach as neither an entity nor an auditor are required to consider Technical Rationale guidance when implementing requirements or performing audits, respectively. To remove this potential compliance issue, BPA believes language requiring Facility Ratings and system voltage limits to be equally limiting or more limiting than what's provided by the TOP in accordance with its RC's SOL methodology needs to be explicitly stated in the Standard.

Furthermore, BPA believes language requiring that criteria developed and documented for stability performance be equally limiting or more limiting than the criteria in its respective RC's SOL methodology needs to be explicitly stated in the Standard.

In consideration of the SDT's comments with regard to the word 'ensure', BPA offers revisions to its comments regarding R6 to replace 'ensure' with 'require'. See below.

R6. Each Planning Coordinator and each Transmission Planner shall **require** that Facility Ratings and system voltage limits used in its Planning Assessment of the Near Term Transmission Planning Horizon are equally limiting or more limiting than the Facility Ratings and system voltage limits provided by the TOP to its RC in accordance with its Reliability Coordinator's SOL methodology.

In addition, each Planning Coordinator and each Transmission Planner shall **require** that criteria developed and documented for stability performance for its Planning Assessment of the Near-Term Transmission Planning Horizon are equally limiting or more limiting than the criteria for stability specified in its respective Reliability Coordinator's SOL methodology. [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

Likes 0

Dislikes 0

### Response

**Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2**

**Answer**

**Document Name**

**Comment**

ERCOT appreciates the Standard Drafting Team's revision to the rationale accompanying Requirement R8.

For purposes of further clarification, is Requirement R8 intended to mean that only the owners of the facilities that comprise the planning event contingency(ies) that cause instability, Cascading or uncontrolled separation that adversely impacts the reliability of the BES as identified in the near-term planning assessment need to be notified that certain specific facilities they own are part of a planning event contingency that would cause instability, Cascading or uncontrolled separation that adversely impacts the reliability of the BES?

Likes 0

Dislikes 0

**Response**

**Pamela Hunter - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company**

**Answer**

**Document Name**

**Comment**

A new NERC time-horizon should be created, termed "Day-Ahead Operations" – operating and resource plans within the day ahead timeframe, to replace the Operations Planning Horizon applicability of R1 through R5 consistent with the intended horizon of SOL exceedance determinations.

Likes 0

Dislikes 0

**Response**

**Rob Watson - Choctaw Generation Limited Partnership, LLLP - 5**

**Answer**

**Document Name**

**Comment**

See comments from Southern Company.

Likes 0

Dislikes 0

**Response**