

## **Mapping Document for FAC-014-3**

Project 2015-09 Establish and Communicate System Operating Limits

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
R1. The Reliability Coordinator shall ensure that SOLs, including Interconnection Reliability Operating Limits (IROLs), for its Reliability Coordinator Area are established and that the SOLs (including Interconnection Reliability Operating Limits) are consistent with its SOL mMethodology.	Requirements R1, R2, and R4 of FAC-014-3 R1. Each Reliability Coordinator shall establish Interconnection Reliability Operating Limits (IROLs) for its Reliability Coordinator Area in accordance with its System Operating Limit Mmethodology (SOL Mmethodology). R2. Each Transmission Operator shall establish System Operating Limits (SOLs) for its portion of the Reliability Coordinator Area in accordance with its Reliability Coordinator's SOL Mmethodology. R4. Each Reliability Coordinator shall establish stability limits to be used in operations when the limit impacts adjacent Reliability Coordinator Areas or more than one Transmission Operator in its Reliability Coordinator Area in accordance with its SOL Mmethodology.	Requirements R1, R2, and R4 of FAC-0143 ensure that SOLs are established in accordance with the Reliability Coordinator's (RC's) SOL Mmethodology Requirement R1 was changed to address an issue with the existing language in FAC-014-2, Requirement R1. With the original language, the RC is responsible for ensuring that SOLs established by the Transmission Operator (TOP) per FAC-014-2, Requirement R2 are consistent with the RC's SOL Mmethodology. This creates a situation where the RC is responsible for "ensuring" the actions of the TOP.  Accordingly, if the TOP does not establish SOLs per its RC's SOL Mmethodology, then 1) the TOP is in violation of Requirement R2, and 2) the RC by defau

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
		the RC did not ensure that the TOP's SOL was consistent with its SOL <a href="Mmethodology">Mmethodology</a> .
		The proposed revision addresses this issue and clarifies the appropriate responsibilities of the respective functional entities.
		Additionally, this requirement carries forward the obligation of the RC to establish IROLs for its RC Area. The RC maintains primary responsibility for establishment of IROLs because these limits have the potential to impact a Wide-area.
		FAC-011-4 requirement R4 further addresses the RC responsibilities (beyond IROL establishment) for stability limit establishment where more than one TOP is impacted.
FAC-014-2, Requirement R2  R2. The Transmission Operator shall establish SOLs (as directed by its Reliability Coordinator) for its portion of the Reliability	FAC-014-3, Requirement R2  R2. Each Transmission Operator shall establish System Operating Limits (SOLs) for its portion of the Reliability Coordinator Area in accordance	The language from the existing FAC-014-2, Requirement R2 that states the TOP, "(as directed by its Reliability Coordinator)" was removed because it causes confusion and may be incorrectly

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
Coordinator Area that are consistent with its Reliability Coordinator's SOL Mmethodology.	with its Reliability Coordinator's SOL  Mmethodology.	understood to mean that the TOPs are only required to establish SOLs if they have been "directed to by their RC." This is not the intended meaning of the requirement, thus, the drafting team has removed the unnecessary and potentially confusing language. The proposed language makes clear that the TOP is the entity responsible for establishing SOLs, and that these SOLs must be established in accordance with the RC's SOL Mmethodology.
R3. The Planning Authority shall establish SOLs, including IROLs, for its Planning Authority Area that are consistent with its SOL Mmethodology.  R4. The Transmission Planner shall establish SOLs, including IROLs, for its Transmission Planning Area that are consistent with its Planning Authority's SOL Mmethodology.	FAC-011-4, Requirement R9, Part 9.2, Subpart 9.2.2  FAC-014-3015-1, Requirements R7R6 R1 - R3  FAC-011-4, Requirement R9, Part 9.2:  R9. Each Reliability Coordinator shall provide its SOL Mmethodology to: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]  9.2 Each of the following entities 30 days-prior to the effective date of the SOL methodology or as soon as practicable if a change must be	The SDT is proposing a construct that does not make use of an SOL  Mmethodology applicable to the planning horizon or the establishment of SOLs consistent with the PC's SOL  Mmethodology.  The PCs and TOPs responsible for planning any portion of the RC's Area are made aware of the RC's SOL  Mmethodology through FAC-011-4, Requirement R9, Part 9.2.2. By having the RC's SOL Mmethodology, PCs and TPs who plan any portion of the System in the



Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	implemented in less than 30 days to address a reliability issue:	RC Area have knowledge of the methods and criteria for establishing SOLs,
	9.2.2 Each Planning Coordinator and Transmission Planner that is responsible for	including the stability performance criteria used for establishing stability limits in the operations horizon.
	planning any portion of the Reliability Coordinator Area;	New Reliability Standard FAC 015-1 along with the changes in the Pproposed FAC-
	FAC-014-3015-1 Requirement R76R1 - R3:	011-4 and FAC-014-3 represent an improvement for planning and operations
	R76. Each Planning Coordinator and each Transmission Planner shall implement a	to better work together to address the reliability issues that are ultimately faced
	documented process to use Facility Ratings, voltage criteria System steady-state	in Real-time operations. FAC-014-3015-1, Requirements R76 R1 - R3 ensures that
	voltage limits and stability criteria in its Planning	Planning Assessments performed for the
	Assessment of the Near-Term Transmission Planning Horizon that are equally limiting or more	Near-Term Transmission Planning Horizon (required by TPL-001-4), are bounded by
	<u>limiting than the criteria for Facility Ratings,</u> <u>System Voltage Limits and stability criteria</u>	modeling data and performance criteria that are equally limiting or more limiting
	<u>specified described in its respective</u> Reliability Coordinator's SOL methodology.	than those established in accordance described within the RC's SOL
	The Planning Coordinator may use less	Mmethodology.
	limiting Facility Ratings, voltage criteriaSystem steady-state voltage limits and stability criteria if it	FAC-015-1, Requirement R1 addresses Facility Ratings, Requirement R2
	provides a technical rationale Each Planning Coordinator shall provide a technical rationale for	addresses the System steady state voltage limits, and Requirement R3



Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	any exceptions to each affected Transmission Planner, Transmission Operator and Reliability Coordinator.  • The Transmission Planner may use less limiting Facility Ratings, voltage criteria System steady-state voltage limits and stability criteria if it provides a technical rationale Each Transmission Planner shall provide a technical rationale for any exceptions to each affected Planning Coordinator, Transmission Operator and Reliability Coordinator.  1. Each Planning Coordinator and each of its Transmission Planners, when developing its steady-state modeling data requirements, shall implement a process to ensure that Facility Ratings used in its Planning Assessment of the Near Term Transmission Planning Horizon are equally limiting or more limiting than the owner provided Facility Ratings used in operations per the Reliability Coordinator's SOL Methodology. The process may allow the use of less limiting Facility Ratings if: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]	addresses the stability performance criteria used in Planning Assessments. These requirements-FAC-014-3, Requirement R76 addresses the three components of SOLs used in operations and thus facilitates continuity between operations and planning, which is conducive to improved reliability.  By implementing Requirements R1 – R3 of FAC-015-1, equally limiting or more limiting Facility Ratings, System steady state voltage limits and stability criteria that are established in accordance with the RC's SOL Methodology are ultimately implemented in the Planning Assessments performed by the PCs and TPs, thus improving reliability by ensuring continuity between planning and operations.



Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	The Facility has higher Facility Ratings as a result of a planned upgrade, addition, or Corrective Action Plan,	
	<ul> <li>Facility Rating differences are due to variations in ambient temperature assumptions,</li> </ul>	
	<ul> <li>The Planning Coordinator provided a technical rationale for using a less limiting Facility Rating to each affected Transmission Planner and Reliability Coordinator, or</li> </ul>	
	<ul> <li>The Transmission Planner provided a technical rationale for using a less limiting Facility Rating to each affected Planning Coordinator and Reliability Coordinator.</li> </ul>	
	2. Each Planning Coordinator and each of its Transmission Planners shall implement a process to ensure that System steady state voltage limits used in its Planning Assessment of the Near-Term Transmission Planning Horizon are equally limiting or more limiting than the System Voltage Limits used in operations per the Reliability	



Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	Coordinator's SOL Methodology. The	
	process may allow the use of less limiting	
	System steady state voltage limits if:	
	[Violation Risk Factor: Medium] [Time	
	Horizon: Long term Planning]	
	The Planning Coordinator provides a	
	technical rationale for using a less	
	limiting System steady state voltage limit	
	to each affected Transmission Planner	
	and Reliability Coordinator, or	
	• The Transmission Planner provides a	
	technical rationale for using a less	
	limiting System steady state voltage limit	
	to each affected Planning Coordinator	
	and Reliability Coordinator.	
	3. Each Planning Coordinator and each of its	
	Transmission Planners shall implement a	
	process to ensure the stability performance	
	criteria used in its Planning Assessment of	
	the Near-Term Transmission Planning	
	Horizon are equally limiting or more limiting	
	than the stability performance criteria used	
	in operations per the Reliability	
	Coordinator's SOL Methodology. The	

Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	process may allow the use of less limiting stability performance criteria if: [Violation Risk Factor: Medium] [Time Horizon: Longterm Planning]  The Planning Coordinator provides a technical rationale for using a less limiting stability performance criterion to each affected Transmission Planner and Reliability Coordinator, or  The Transmission Planner provides a technical rationale for using a less limiting stability performance criterion to each affected Planning Coordinator and Reliability Coordinator.	
FAC-014-2, Requirement R5, R5.1  R5. The Reliability Coordinator, Planning Authority and Transmission Planner shall each provide its SOLs and IROLs to those entities that have a reliability-related need for those limits and provide a written request that	The communication of SOL and IROL information from the Reliability Coordinator is addressed by:  1. FAC-014-3, Requirement R5 (addresses communication from the Reliability Coordinator to other entities)	Reference the description above for Requirement R3 which describes a different set of roles and responsibilities for the PC and TP as defined in FAC-015 1.  While the existing requirements in FAC 014-2, Requirement R5 are preserved in FAC-014-3, Requirement R5, FAC-014-3

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
includes a schedule for delivery of those limits as follows:  R5.1. The Reliability Coordinator shall provide its SOLs (including the subset of SOLs that are IROLs) to adjacent Reliability Coordinators and Reliability Coordinators who indicate a reliability-related need for those limits, and to the Transmission Operators, Transmission Planners, Transmission Service Providers and Planning Authorities within its Reliability Coordinator Area. For each IROL, the Reliability Coordinator shall provide the following supporting information:  R5.1.1. Identification and status of the associated Facility (or group of Facilities) that is (are) critical to the derivation of the IROL.  R5.1.2. The value of the IROL and its associated Tv.  R5.1.3. The associated Contingency(ies).  R5.1.4. The type of limitation represented by the IROL (e.g., voltage collapse, angular stability).	<ol> <li>IRO-014-3, Requirement R1 (addresses communication between Reliability Coordinators to support reliable operations)</li> <li>FAC-014-3, Requirement R5:</li> <li>Each Reliability Coordinator shall provide:</li> <li>Each Planning Coordinator and each Transmission Planner within its Reliability Coordinator Area, SOLs for its Reliability Coordinator Area (including the subset of SOLs that are IROLs) at least once every twelve calendar months.</li> <li>Each impacted Planning Coordinator and each impacted Transmission Planner within its Reliability Coordinator Area, the following information for each established stability limit and each established IROL at least once every twelve calendar months:</li> <li>The value of the stability limit or IROL;</li> <li>Identification of the Facilities that are critical to the derivation of the stability limit or IROL;</li> <li>The associated IROL Tv for any IROL;</li> <li>The associated Contingency(ies);</li> </ol>	Requirement R5 more specifically address the communications requirements for the RC. Each recipient of the RC communications is addressed in a separate subpart because each recipient has a slightly different need. This approach represents an improvement over the former approach.  IRO-014-3, Requirement R1 and subparts addresses RC communication of critical operational information to adjacent RCs, which addresses RC-to-RC communication and coordinated operations issues.

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	5.2.5. A description of the associated system conditions associated with the stability limit or IROL; and	
	5.2.6. The type of limitation represented by the stability limit or IROL (e.g., voltage collapse, angular stability).	
	5.3. Each impacted Transmission Operator within its Reliability Coordinator Area, the value of the stability limits established pursuant to Requirement R4 and each IROL established pursuant to Requirement R1, in an agreed upon time frame necessary for inclusion in the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.	
	5.4. Each impacted Transmission Operator within its Reliability Coordinator Area, the information identified in Requirement R5 Parts 5.2.2 – 5.2.5–6 for each established stability limit or each IROL, and any updates to that information within an agreed upon time frame necessary for inclusion in the Transmission Operator's Operational Planning Analyses.	
	5.5. Each requesting Transmission Operator within its Reliability Coordinator Area, requested	



Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	SOL information for its Reliability Coordinator Area, on a mutually agreed upon schedule.	
	IRO-014-3, Requirement R1	
	R1. Each Reliability Coordinator shall have and implement Operating Procedures, Operating Processes, or Operating Plans, for activities that require notification or coordination of actions that may impact adjacent Reliability Coordinator Areas, to support Interconnection reliability. These Operating Procedures, Operating Processes, or Operating Plans shall include, but are not limited to, the following:	
	1.1. Criteria and processes for notifications.	
	1.2. Energy and capacity shortages.	
	1.3. Control of voltage, including the coordination of reactive resources.	
	1.4. Exchange of information including planned and unplanned outage information to support its Operational Planning Analyses and Real-time Assessments.	
	1.5. Provisions for periodic communications to support reliable operations.	

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
FAC-014-2, Requirement R5, R5.2 R5.2 The Transmission Operator shall provide any SOLs it developed to its Reliability Coordinator and to the Transmission Service Providers that share its portion of the Reliability Coordinator Area.	<ol> <li>FAC-014-3, Requirement R3</li> <li>MOD-028-2, Requirement R7</li> <li>MOD-029-2a, Requirement R4</li> <li>MOD-030-3, Requirement R2.6</li> <li>FAC-014-3, Requirement R3</li> <li>The Transmission Operator shall provide its SOLs to its Reliability Coordinator in accordance with its Reliability Coordinator's SOL Methodology.</li> <li>MOD-028-2, Requirement R7:</li> </ol>	The communication of SOLs from the TOP to its RC is preserved in FAC-014-3, Requirement R3. The revised language represents an improvement on the current standard because the specifics of TOP communication to the RC is now addressed in the RC's SOL Methodology. This revised requirement has a companion Requirement R7 in FAC-011-4 which states:
	R7. The Transmission Operator shall provide the Transmission Service Provider of that ATC Path with the most current value for TTC for that ATC Path no more than:  R7.1. One calendar day after its determination for TTCs used in hourly and daily ATC calculations.	R7. Each Reliability Coordinator shall include in its SOL Methodology the method and periodicity for Transmission Operators to communicate SOLs it established to its RC(s).
	R7.2. Seven calendar days after its determination for TTCs used in monthly ATC calculations.  MOD-029-2a, Requirement R4:  R4. Within seven calendar days of the finalization of the study report, the Transmission Operator shall make available to the Transmission Service Provider of the ATC Path, the most current value	The Transmission Service Provider (TSP) was removed from the SOL communication chain because the TSP does not need SOLs to perform its obligations specified in the Modeling, Data, and Analysis (MOD) standards; rather, they need Total Transfer Capability (TTC) and Total Flowgate

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	for TTC and the TTC study report documenting the assumptions used and steps taken in determining the current value for TTC for that ATC Path.  MOD-030-3, Requirement R2.6:  [The TOP shall] R2.6. Provide the Transmission Service Provider with the TFCs within seven calendar days of their establishment.	Capability (TFC) from the TOPs as required in Requirement R7 of MOD-028-2, Requirement R4 of MOD-029-2a, and Requirement R2.6 of MOD-030-3. The TTCs and TFCs provided to the TSPs already reflect the impact of any SOLs.
R5.3 The Planning Authority shall provide its SOLs (including the subset of SOLs that are IROLs) to adjacent Planning Authorities, and to Transmission Planners, Transmission Service Providers, Transmission Operators and Reliability Coordinators that work within its Planning Authority Area.  R5.4 The Transmission Planner shall provide its SOLs (including the subset of SOLs that are IROLs) to its Planning Authority, Reliability Coordinators, Transmission Operators, and Transmission Service Providers that work within its Transmission Planning Area and to adjacent Transmission Planners.	<ol> <li>FAC-014-3015-1, Requirements R7, R8R6, R7 R1 R4</li> <li>MOD-028-2, Requirement R7</li> <li>MOD-029-2a, Requirement R4</li> <li>MOD-030-3, Requirement R2</li> <li>TPL-001-4, Requirement R8</li> <li>FAC-014-3015-1 Requirements R76, R87 R1 Requirements R3 Requirements R3 and R4-section above.)</li> <li>R7. Each Planning Coordinator and each Transmission Planner shall annually (?) communicate the following information for Corrective Action Plans developed to address any instability identified in its Planning Assessment of the Near-Term Transmission Planning Horizon to each impacted</li> </ol>	Provision of important planning study information to TOPs and RCs is preserved in Reference the Description and Change Justification above for Requirements R3 and R4, which describes a different set of roles and responsibilities for the PC and TP as defined in FAC-014-3015-1, R7.  FAC-014-3015-1, Requirements R76-R1-R3 results in PCs and TPs using Facility Ratings, System steady state voltage limits criteria, and stability performance criteria in their Planning Assessments of the Near-Term Transmission Planning Horizon that are equally limiting or more limiting than the criteria for Facility Ratings, System Voltage Limits, and

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	Coordinator. This communication shall include: 7.1 The Corrective Action Plan developed to mitigate the identified instability, including any automatic control or operator-assisted actions (such as Remedial Action Schemes, under voltage load shedding, or any other planned mitigation actions); 7.2 The type of instability addressed by the Corrective Action Plan (e.g. steady-state and/or transient voltage instability, angular instability including generating unit loss of synchronism, or unacceptable damping); 7.3 The associated stability criteria violation requiring the Corrective Action Plan (e.g. violation of transient voltage response criteria or damping rate criteria); 7.4 The planning event Contingency(ies) associated with the identified instability requiring the Corrective Action Plan; 7.5 The System conditions and Facilities associated with the identified instability requiring the Corrective Action Plan.	stability performance criteria established in accordance described within the RC's SOL Methodology.  FAC-014-3015-1, Requirement R7, which4 requires the PC and TP to annually communicate information for Corrective Action Plans developed to address any instability. Cascading or uncontrolled separation identified in the its Planning Assessments and Transfer Capability assessments to each impacted RCs, TOPs, TOs, and GOs TOP and RC. The subparts of Requirement R74 require the communication of key information that can be useful to the RC and TOP to establish stability limits and IROLs that will ultimately be used in real-time operations. This information is also necessarily communicated to TOs and GOs for their use in identifying Facilities that require higher levels of vegetative management or cyber protection.  The TSP was removed from the SOL communication chain. The TSP does not need SOLs from the PCs or TPs; rather,



Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	interruption of Firm Transmission Service, or Non-Consequential Load Loss required to address the instability, Cascading or uncontrolled separation;	
	4.6 Any Corrective Action Plan associated with the instability, Cascading or uncontrolled separation.	
	MOD-028-2, Requirement R7:	
	<b>R7</b> . The Transmission Operator shall provide the Transmission Service Provider of that ATC Path with the most current value for TTC for that ATC Path no more than:	
	<b>R7.1.</b> One calendar day after its determination for TTCs used in hourly and daily ATC calculations.	
	<b>R7.2.</b> Seven calendar days after its determination for TTCs used in monthly ATC calculations.	
	MOD-029-2a, Requirement R4:	
	<b>R4.</b> Within seven calendar days of the finalization of the study report, the Transmission Operator shall make available to the Transmission Service Provider of the ATC Path, the most current value for TTC and the TTC study report documenting the	



Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
	assumptions used and steps taken in determining the current value for TTC for that ATC Path.	
	MOD-030-3, Requirement <b>R2.6</b> :	
	<b>R2.6.</b> [The TOP shall] Provide the Transmission Service Provider with the TFCs within seven calendar days of their establishment.	
	TPL-001-4, Requirement R8:	
	R8. Each Planning Coordinator and Transmission Planner shall distribute its Planning Assessment results to adjacent Planning Coordinators and adjacent Transmission Planners within 90 calendar days of completing its Planning Assessment, and to any functional entity that has a reliability related need and submits a written request for the information within 30 days of such a request.	
	<b>8.1.</b> If a recipient of the Planning Assessment results provides documented comments on the results, the respective Planning Coordinator or Transmission Planner shall provide a documented response to that recipient within 90 calendar days of receipt of those comments.	

Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
FAC-014-2, Requirement R6  R6. The Planning Authority shall identify the subset of multiple contingencies (if any), from Reliability Standard TPL-003 which result in stability limits.  R6.1 The Planning Authority shall provide this list of multiple contingencies and the associated stability limits to the Reliability Coordinators that monitor the facilities associated with these contingencies and limits.  R6.2 If the Planning Authority does not identify any stability-related multiple contingencies, the Planning Authority shall so notify the Reliability Coordinator.	FAC-014-3015-1, Requirement R4 R8R7 (See the Translation above for Requirements R5.3 and R5.4 section above.)	FAC-014-3015 1, Requirement R6-R87 covers the content of FAC-014-2, Requirement R6.1 and improves upon it as follows:  • FAC-014-3015-1, Requirement R4 R87 addresses not only the identification of multiple contingencies that result in stability criteria violation-limits, but also address the key information RCs need to establish stability limits and IROLs used in operations. Unlike FAC-014-2, Requirement R6.1, the FAC-014-3015-1, Requirement R4-R87 ensures the type of instability, relevant-the associated stability criteria, the associated planning event contingencies, the associated system conditions & Facilities, and Corrective Action Plans developed for its mitigation assumptions used by the PC are communicated by the PC to the appropriate TOP and RC.



Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
		<ul> <li>Additionally, FAC-015-1, Requirement R4 includes all planning events (single and</li> </ul>
		multiple contingencies) that resu in instability, Cascading, or uncontrolled separation.  • FAC-014-2, Requirement R6, R6.2
		is addressed by FAC- <u>014-3</u> 015-1, Requirement <u>R4-R87</u> because all instances of instability identified
		by the PC are to be communicate to the impacted TOP and RC in accordance with FAC 015-1, Requirement R4. In
		additionFurther, it may be noted that FAC-014-2, Requirement R6 R6.2 is administrative in nature,
		given that the existing FAC-014-2 Requirement R6, R6.1 and proposed FAC-014-3015-1,
		Requirement R4s-R87 both require communication of a defined set of stability related
		data. The absence of any communication of stability related data inherently implies the PC has



Standard: FAC-014-2 Establish and Communicate System Operating Limits		
Requirement in Approved Standard	Translation to New Standard or Other Action	Description and Change Justification
		not identified any instability and therefore has nothing to communicate.