Unofficial Comment Form

Project 2015-09 Establish and Communicate System Operating Limits

**Do not** use this form for submitting comments. Use the [electronic form](https://sbs.nerc.net/) to submit comments on **Project 2015-09 Establish and Communicate System Operating Limits**. The electronic form must be submitted by **8 p.m. Eastern, October 10, 2018**.

Documents and information about this project are available on the [project page](https://www.nerc.com/pa/Stand/Pages/Project-2015-09-Establish-and-Communicate-System-Operating-Limits.aspx). If you have questions, contact Principal Technical Advisor, Darrel Richardson (via email) or at (609) 613-1848.

# Background

The Reliability Standards that address SOLs – FAC-010, FAC-011, and FAC-014 – have remained essentially unchanged since their initial versions. Since that time, many improvements have been made to the body of reliability standards, specifically those in the TPL, TOP, and IRO family of standards. The former TPL-001, -002, -003, and -004 Reliability Standards have been replaced with TPL-001-4, all of the TOP standards were replaced with the currently effective TOP-001, TOP-002, and TOP-003, and several IRO standards have been replaced as well. One of the primary objectives of Project 2015-09 is to make changes to the FAC standards to create better alignment with the currently effective TPL, TOP, and IRO standards and the revised definitions of Operational Planning Analysis (OPA) and Real-time Assessments (RTA).

Please provide your responses to the questions listed below along with any detailed comments.

## Questions

1. Industry response to the draft SOL Exceedance definition indicated numerous significant concerns. Given this response, the SDT concluded that creating a definition of SOL Exceedance which adequately reflects reliable operating principles could create an unnecessary compliance burden if action is not taken to substantially modify the existing TOP and IRO standards. Therefore, the SDT maintained system performance criteria through FAC-011-4 Requirement R6, similar to the approach within the currently effective FAC standards, rather than through an SOL Exceedance definition. Do you agree with the performance criteria in Requirement R6?

[ ]  Yes

[ ]  No

Comments:

1. If you have any other comments regarding FAC-011-4 **that you haven’t already provided**, please provide them here.

Comments:

1. The SDT acknowledges that requirement R6 could alternatively be located within a TOP or IRO standard; however, the Project 2015-09 SAR does not specifically authorize the SDT to modify those standards. The SDT is seeking feedback specific to the content of the requirement not where it should reside. Proposed Requirement R6 was created to correspond with FAC-011-4 Requirement R6 in lieu of creating a definition for SOL Exceedance. Do you agree with Requirement R6?

[ ]  Yes

[ ]  No

Comments:

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

Comments:

1. The original posting of FAC-015-1 included six requirements.  Industry comments to this original version indicated significant concerns.  In response to these concerns, the SDT attempted to streamline and clarify the intended interactions between relevant functional entities and to consolidate the standard into fewer requirements.  To achieve this the SDT:
* Consolidated Requirements R1 – R5 in the original posting into three (R1 – R3) requirements,
* Clarified the roles of the Planning Coordinator and Transmission Planner in Requirements R1 – R3, and
* Clarified that Facility Ratings are “owner-provided” in Requirement R1.

The SDT acknowledges that some of the requirements in FAC-015-1 could alternatively be located within other standards such as TPL, MOD, etc.; however, the Project 2015-09 SAR does not currently authorize the SDT to modify those standards.  The SDT is seeking feedback specific to the content of the requirement not where it should reside. Do you support the revised FAC-015-1? Please provide any other comments regarding FAC-015-1.

[ ]  Yes

[ ]  No

Comments:

1. Discussions within the SDT indicated concerns with eliminating some of the components of the approved SOL definition. While the industry feedback was largely supportive of the draft SOL definition provided in the informal posting, the SDT modified the proposed definition to incorporate some of the concepts in the approved version. The SDT believes that the revised definition posted for ballot represents an improvement over the definition provided in the informal posting. Reference the SOL rationale document for more information. Do you agree with the proposed SOL definition?

[ ]  Yes

[ ]  No

Comments:

1. With the retirement of FAC-010, and the elimination of Planning-based SOLs and IROLs, do you agree with the changes to CIP-014, FAC-003, FAC-013, PRC-002, PRC-023 and PRC-026?

[ ]  Yes

[ ]  No

Comments: