

## Comment Report for Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705 (Project 2008-04)

The SAR drafting team thanks all commenters who submitted comments on SAR and associated proposed modifications to FAC-010 — System Operating Limits Methodology for the Planning Horizon and FAC-011 — System Operating Limits Methodology for the Operations Horizon.

This SAR and associated standards were posted for a 45-day public comment period from January 24 through March 7, 2008. The standard drafting team asked stakeholders to provide feedback on the standard through a special Standard Comment Form. There were 22 sets of comments, including comments from more than 130 different people from more than 50 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

Based on the comments received, the drafting team has revised the SAR and standards to include development of Violation Severity Levels for FAC-010, FAC-011, and FAC-014 –and to remove the references to “loss of consequential load.” The drafting team is posting the SAR and revised standards for a 30-day comment period.

In this “Consideration of Comments” document stakeholder comments have been organized so that it is easier to see the responses associated with each question. All comments received on the SAR can be viewed in their original format at:

[http://www.nerc.com/~filez/standards/Facility\\_Ratings\\_Project\\_2008-04.html](http://www.nerc.com/~filez/standards/Facility_Ratings_Project_2008-04.html)

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski at 609-452-8060 or at [gerry.adamski@nerc.net](mailto:gerry.adamski@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Reliability Standards Process Manual:  
<http://www.nerc.com/standards/newstandardsprocess.html>.

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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

	Commenter	Organization	Industry Segment											
			1	2	3	4	5	6	7	8	9	10		
1.	Anita Lee (G1)	Alberta Electric System Operator		x										
2.	Ken Goldsmith (G3)	ALTW				x								
3.	Scott Lockwood (G6)	American Electric Power	x		x		x							
4.	Jason Shaver	American Transmission Company	x											
5.	Dave Rudolph (G3)	BEPC	x		x		x	x						
6.	Phil Park	British Columbia Transm. Corp.		x										
7.	Brent Kingsford (G1)	California ISO		x										
8.	Dale Bodder	CenterPoint Energy	x											
9.	Ron Szymczak	ComEd Transmission Planning												
10.	Peter Yost (G4)	Consolidated Edison Co. of NY, Inc.	x			x	x	x						
11.	Jeanne Kurzynowski (G2)	Consumers Energy Company			x	x	x							
12.	Bill Mitchell (G5)	Delmarva Power	x											
13.	Ronald Hart (G4)	Dominion Resources, Inc.					x							
14.	Jack Kerr	Dominion Virginia Power	x											
15.	Greg Rowland	Duke Energy	x		x									
16.	Brian Berkstresser (G6)	Empire District Electric	x		x		x							
17.	Steve Myers (G1)	ERCOT		x										
18.	Doug Hohlbaugh/Sam Ciccone	FirstEnergy Corp.	x		x		x	x						
19.	Linda Campbell	Florida Reliability Coordinating Council												x
20.	Joseph Knight (G3)	GRE	x		x		x	x						

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Commenter		Organization	Industry Segment										
			1	2	3	4	5	6	7	8	9	10	
21.	Alessia Dawes	Hydro One Networks, Inc.	x		x								
22.	David Kiguel (G4)	Hydro One Networks, Inc.	x		x								
23.	Sylvain Clermont (G4)	Hydro-Québec TransÉnergie	x	x									
24.	Roger Champagne (I) (G4)	Hydro-Québec TransÉnergie (HQT)	x										
25.	Biju Gopi (G4)	Independent Electricity SO		x									
26.	Ron Falsetti (I) (G1)	Independent Electricity SO		x									
27.	Kathleen Goodman (G4)	ISO New England		x									
28.	Matt Goldberg (G1)	ISO New England		x									
29.	Jim Cyrulewski (G2)	JDRJC Associates									x		
30.	Jim Useldinger (G6)	Kansas City Power & Light Co.	x		x			x					
31.	Eric Ruskamp (G3)	Lincoln Electric System	x		x			x	x				
32.	Donald Nelson (G4)	MA Dept. of Public Utilities										x	
33.	Robert Coish (G3)	Manitoba Hydro	x		x			x	x				
34.	Ron Mazur (G1)	Manitoba Hydro	x		x			x	x				
35.	Tom Mielnik (G3)	MEC	x		x			x	x				
36.	Bill Phillips (G1)	Midwest ISO		x									
37.	Dede Subakti (G2)	Midwest ISO		x									
38.	Jason Marshall (G2)	Midwest ISO		x									
39.	Marie Knox (G2)	Midwest ISO		x									
40.	Terry Bilke (G3)	Midwest ISO		x									
41.	Larry Brusseau (G3)	Midwest Reliability Organization											x
42.	Michael Brytowski (G3)	Midwest Reliability Organization											x
43.	Carol Gerou (G2) (G3)	Minnesota Power	x		x			x					
44.	Michael Ranalli (G4)	National Grid	x				x						
45.	Randy MacDonald (G4)	New Brunswick System Operator		x									
46.	Gregory Campoli (G4)	New York ISO		x									
47.	Jim Castle (G1)	New York ISO		x									
48.	Ralph Rufrano (G4)	New York Power Authority	x				x	x	x			x	



**Index to Questions, Comments, and Responses**

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**Consideration of Comments on First Draft of SAR and Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705 (Project 2008-04)**

1. Do you agree that the scope of the SAR adequately addresses the directives in FERC Order 705 that are relative to FAC-010 and FAC-011? If you believe that the drafting team has missed a directive, please identify the directive by paragraph number in your comments.

**Summary Consideration:** Most commenters agreed with the modifications made by the drafting team.

#1 – Commenter	Yes	No	Comment
Manitoba Hydro			<p>MH does not see the term "consequential load" used in R2.3 of FAC-10-1 (reproduced below), so what needs to be clarified?</p> <p>R2.3. Starting with all Facilities in service, the system's response to a single Contingency, may include any of the following:                      R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers connected to or supplied by the Faulted Facility or by the affected area.                      R2.3.2. System reconfiguration through manual or automatic control or protection actions.                      R2.3.3. To prepare for the next Contingency, system adjustments may be made, including changes to generation, uses of the transmission system, and the transmission system topology.</p>
<p><b>Response:</b> The drafting team has elected to remove the footnote that referenced "consequential load." This term is currently being defined as part of the revisions to the TPL series of standards with the Assess Transmission Future Needs Standard Drafting Team.</p>			
American Transmission Company		X	Please see our comments below.
<p><b>Response:</b> Please see the response to your comments below.</p>			
FirstEnergy Corp.	X		<p>We agree that the FERC directives have been addressed, however, with regard to the Violation Severity Levels (VSL), it is our understanding the the VSL drafting team (Proj. 2007-23) did not develop VSLs for the FAC-010, -011, and -014 standards and only focused on the initially FERC approved 83 standards. This SAR should more correctly state that the "VSLs will be developed by the FAC SDT and replace the levels of non-compliance" [Note that VSLs for FAC-014-1 should also be developed and in the scope].</p>
<p><b>Response:</b> When the requesters developed the SAR they thought the VSL DT had developed VSLs for FAC-010, FAC-011 and FAC-014. A new SAR is underway to develop a new set of VSLs for the EOP standards and for FAC-010, FAC-011 and FAC-014.</p>			

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#1 – Commenter	Yes	No	Comment
Oncor Electric Delivery	x		Oncor endorses the changes as made by the standards drafting team.
<b>Response:</b> The drafting team appreciates your support.			
British Columbia Transm. Corp.	x		
CenterPoint Energy	x		
Dominion Virginia Power	x		
Duke Energy	x		
ComEd Transmission Planning	x		
FRCC Compliance Committee	x		
Hydro One Networks, Inc.	x		
Hydro-Québec/TransÉnergie	x		
Independent Electricity SO	x		
IRC Standards Review Committee	x		
Midwest ISO	x		
Midwest Reliability Organization	x		
Pepco Holdings, Inc.	x		
PJM Interconnection	x		
PSC of South Carolina	x		
SPP Operating Reliability WG	x		

**Consideration of Comments on First Draft of SAR and Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705 (Project 2008-04)**

2. Do you agree that the footnote added to FAC-010 and FAC-011 addresses the concern identified in Order 705 relative to loss of consequential load?

**Summary Consideration:** The ATF SDT working on revisions to the “TPL” series of standards has proposed a NERC definition of “Consequential Load Loss.” Because Order 705 did not direct NERC to include this footnote in FAC-010 and FAC-011, and because NERC has already made a commitment to modify the ATC related standards and the FAC related standards to align with the TPL standards when they are revised, the drafting team has elected to remove the footnote from the revised standards. This shall serve as a single response to all comments submitted in response to this question.

#2 – Commenter	Yes	No	Comment
American Transmission Company		x	<p>In Order 705, FERC states that it will approve FAC-010-1, Requirement R2.3, and the ERO should ensure that the clarification developed in response to Order No. 693 is made to TPL-002-0. Since FAC-010, and Requirement R2.3.1 specifically, are to reflect the system performance requirements specified in TPL-002, the ERO should modify the text of FAC-010 R2.3.1 to reflect the clarification that FERC desires in TPL-002, after the change has been made to TPL-002.</p> <p>The text of Footnote 2 should be incorporated into FAC-010 after TPL-002 is changed. Otherwise, the Footnote 2 text is contradictory to the existing R2.3.1 text and Table 1, Footnote b of TPL-002-0.</p> <p>The text of Footnote 2 is applicable to R2.3.1, not R2.3.2 and R2.3.3. Therefore, when this text is added, then it should be added to R2.3.1, not R2.3.</p>
British Columbia Transm. Corp.		x	<p>We have a number of comments. 1. The footnote should be to R2.3.1, not R2.3. 2. Should consider replacing R2.3.1 with the statement in the footnote. 3. Consider the following for R2.3.1: "Planned or controlled interruption of electric supply to radial customers or some local network customers directly served by the elements that are removed from service as a result of the contingency."</p>
CenterPoint Energy		x	<p>The ATFN SDT is currently refining the definition of Consequential Load Loss based on FERC directives and industry comments. This SDT and the ATFN SDT must coordinate and any footnote included in FAC-010-2 and FAC-011-2 clarifying Consequential Load Loss should contain the latest version of the ATFN SDT definition for the term.</p>
Dominion Virginia Power		x	<p>It comes close, but there is still an opportunity to provide more clarity. Even though Order 705 references requirement 2.3 in the discussion of consequential load, the specific concern stated in the Order (paragraph</p>



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#2 – Commenter	Yes	No	Comment
			<p>50) was with the wording of requirement 2.3.1 which is quoted verbatim in that paragraph. Therefore, if a footnote is to be used, it should apply to 2.3.1 only instead of being attached to 2.3. The wording of the proposed footnote is based upon the definition of consequential load provided in Order 693 which limits the interruption of electric supply to the load that is directly served by the elements that are removed from service as a result of the contingency. However, the wording of 2.3.1 refers to load in "the affected area" as well as load "connected to or served by the Faulted Facility" and therefore seems inconsistent with the explanatory footnote (or at least not totally clear). Consequently, a better solution would be to eliminate the footnote on 2.3 and incorporate the definition of consequential load into a revision of 2.3.1 that would read:</p> <p>R2.3.1. Planned or controlled interruption of electric supply to radial customers or some local network customers limited to the load that is directly served by the elements that are removed from service as a result of the contingency.</p>
Duke Energy		x	<p>The footnote is insufficiently clear and does not reflect the latest work of the TPL Standards Drafting Team. When FAC-010-2 and FAC-011-2 go to ballot, they must contain the latest work of the ATFNSDT work on TPL-001-1 defining Consequential Load. This is supported by FERC's directive in paragraph 53 of Order No. 705 : "Order No. 693 stated that the transmission system should not be planned to permit load shedding for a single contingency. Order No. 693 directed NERC to clarify the planning Reliability Standard TPL-002-0 accordingly. The Commission reaches the same conclusion here. We will approve Reliability Standard FAC-010-1, Requirement R2.3 and the ERO should ensure that the clarification developed in response to Order No. 693 is made to the FAC Reliability Standards as well."</p>
FirstEnergy Corp.		x	<p>We suggest that the FAC SDT consider coordination with the ATFN SDT (Proj. 2006-02) since the AFTN team has already proposed, in their initial draft of TPL-001-1, an official NERC term for "Consequential Load Loss".</p>
Manitoba Hydro		x	<p>MH does not see the term "consequential load" used in R2.3 of FAC-10-1, so what needs to be clarified?</p> <p>MH disagrees with the footnote 2. R2.3.1 clearly defines that radial load or some local network customers connected to or supplied by the Faulted</p>

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#2 – Commenter	Yes	No	Comment
			facility or affected areas can be interrupted. The footnote narrows the definition to only direct connected load, which is not appropriate - creates a conflict with requirement.
Midwest ISO		x	The footnote should also explicitly exclude all actions resulting from the operation of UFLS and UVLS.
Omaha Public Power District		x	The placement of the superscript 2 at the end of R2.3 of FAC-011 makes R2.3.2 inconsistent with R2.3, because R2.3.2 allows interruption of other network customers under certain conditions. It would seem to be better to place the superscript 2 at the end of R2.3.1 rather than at the end of R2.3, in both FAC-010 and FAC-011.
Pepeco Holdings, Inc.		x	The proposed footnote, if it is to be used, should be applied to R2.3.1 only and not to R2.3 in general. The wording of the proposed footnote limits the interruption of electric supply to the load directly served by the elements that are removed from service by the single contingency. The footnote is silent on "affected area" load. In order to clarify R2.3.1 would be better to eliminate the proposed footnote and modify R2.3.1 with the following:  R2.3.1 Planned or controlled interruption of electric supply to radial customers or some local network customers load that is directly served by the elements that are removed from service as result of the contingency.
PJM Interconnection		x	Since the term consequential load is used in other standards, this definition should be added to the NERC Glossary. This should be left up to the standard drafting team and consensus of industry comments.
ComEd Transmission Planning	x		
FRCC Compliance Committee	x		
Hydro One Networks, Inc.	x		
Hydro-Québec/TransÉnergie	x		
Independent Electricity SO	x		
IRC Standards Review Committee	x		
Midwest Reliability Organization	x		
NPCC Regional Standards Cmte.	x		
Oncor Electric Delivery	x		

**Consideration of Comments on First Draft of SAR and Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705  
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<b>#2 – Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
PSC of South Carolina	x		
SPP Operating Reliability WG	x		

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3. Do you agree with the drafting team’s removal of the phrase “e.g., load greater than studied?”

**Summary Consideration:** Most commenters agreed with the drafting team’s removal of the phrase, “load greater than studied.” Some commenters suggested that the existing requirement was confusing, and the drafting team modified the phrasing of the requirement to clarify the intent. The revision from the last approved version of the standard is shown below:

**R2.3.2** Interruption of other network customers, (a) only if the system has already been adjusted, or is being adjusted, following at least one prior outage, or (b) if the real-time operating conditions are more adverse than anticipated in the corresponding studies, ~~e.g., load greater than studied.~~

#3 – Commenter	Yes	No	Comment
American Transmission Company		x	<p>The SAR should explain the consequence of deleting the language from requirement 2.3.2. The language in question provides an example for Requirement 2.3.2. How should the statement "...if the real-time operating conditions are more adverse than anticipated in the corresponding studies" be interpreted if it is not load greater than studied?</p> <p>As a Transmission Owner and Operator we are not responsible for load forecasting but we use the load forecasting provided to us for our studies. Is anyone in violation of this Standard if the load forecasted is lower than the actual operating conditions?</p> <p>The SDT should confirm that this standard dictates what has to be included in a methodology and that it does not dictate how in real-time a Transmission Operator is to act to control to their SOLs/IROLs. This confirmation is needed because other NERC standards address what the Transmission Operator has to do in real-time and that this standard is not one of them.</p>
<p><b>Response:</b>                      The system configuration in real-time wasn’t the same as it was when the studies were conducted.                      There are no requirements in the standard for load forecasting, hence there can’t be a violation of this standard related to load forecasting.                      There are no real-time requirements in FAC-010 or FAC-011.</p>			
Midwest ISO		x	<p>I agree with the drafting teams removal of the phrase "e.g., load greater than studied". However, the drafting team should delineate between the contingency conditions from the system conditions. The separate system conditions are the reason to adjust generation and not the previously</p>

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#3 – Commenter	Yes	No	Comment
			discussed contingency; therefore, the separate system conditions should be emphasize so that there is no misunderstanding.
<b>Response:</b> For clarification purposes, the drafting team added an "(a)" and added a "(b)" to the subrequirement.			
Midwest Reliability Organization		x	The MRO agrees with the drafting teams removal of the phrase "e.g., load greater than studied"; however, the drafting team should further clarify the subrequirement. The MRO finds the use of 'or' in the subrequirement to be very confusing. The MRO also would like clarification on 'Prior Outage'.
<b>Response:</b> For clarification purposes, the drafting team added an "(a)" and added a "(b)" to the subrequirement.			
PJM Interconnection		x	Removing this example would make the standard less clear but this removal does not change the intent. This should be left up to the standard drafting team and consensus of industry comments.
<b>Response: Agree</b>			
British Columbia Transm. Corp.	x		
CenterPoint Energy	x		
Dominion Virginia Power	x		
Duke Energy	x		
ComEd Transmission Planning	x		
FirstEnergy Corp.	x		
FRCC Compliance Committee	x		
Hydro One Networks, Inc.	x		
Hydro-Québec/TransÉnergie	x		
Independent Electricity SO	x		
IRC Standards Review Committee	x		
Manitoba Hydro	x		
NPCC Regional Standards Cmte.	x		
Oncor Electric Delivery	x		
Pepco Holdings, Inc.	x		
PSC of South Carolina	x		
SPP Operating Reliability WG	x		

**Consideration of Comments on First Draft of SAR and Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705 (Project 2008-04)**

4. Do you agree with the drafting team's withdrawal of the definition for "Cascading Outage" and the resultant use of the defined term, "Cascading" in the revised standards?

**Summary Consideration:** Most commenters agreed with the withdrawal of the definition for "Cascading Outage" – several commenters suggested that the revised standard should omit the word, "outage" from 2.2 in both FAC-010 and FAC-011 and the drafting team has done that.

#4 – Commenter	Yes	No	Comment
British Columbia Transm. Corp.		x	The word "outage" following "Cascading" can also be deleted. It is redundant with respect to the definition of Cascading.
<b>Response:</b> Agreed. The drafting team made this change to both FAC-010 and FC-011 R2.2.			
ComEd Transmission Planning		x	In both standards, FAC-010 and FAC-011, in section R2.2 the following wording change is required: "and Cascading (delete the word "outages") or uncontrolled separation shall not occur."
<b>Response:</b> Agreed. The drafting team made this change to both FAC-010 and FC-011 R2.2.			
Midwest ISO		x	Should text "(or condition)" be added to the Cascading definition listed in the SAR. Plus, where is the cascading definition in the NERC FAC-010-2 standard? I don't see this definition listed in the NERC FAC-010-2 standard.
<b>Response:</b> Because the definition of "Cascading" is already in the approved NERC Glossary of Reliability Terms, it was not included as a new definition in the proposed revisions to FAC-010 and FAC-011.			
Omaha Public Power District		x	Withdrawal of the definition for Cascading Outage is acceptable, but the manner in which FAC-010 and FAC-011 were revised makes for awkward reading, because the approved definition of Cascading treats the term Cascading as a noun, while the revised versions of FAC-010 and FAC-011 use the term as an adjective (modifying the word outages). It would seem to be more proper grammatically, in FAC-010 and FAC-011, to replace the words Cascading Outages by just the word Cascading (i.e., striking the word Outages).
<b>Response:</b> Agreed. The drafting team made this change to both FAC-010 and FC-011 R2.2.			
Manitoba Hydro	x		The approved definition of cascading is clear. The word "outages" could be removed from the standards without changing the understanding.
<b>Response:</b> Agreed. The drafting team made this change to both FAC-010 and FC-011 R2.2.			
PJM Interconnection	x		The proposed use of Cascading adequately covers the intent of the Standard.
<b>Response:</b> Thank you for your affirmative response.			

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<b>#4 – Commenter</b>	<b>Yes</b>	<b>No</b>	<b>Comment</b>
American Transmission Company	x		
CenterPoint Energy	x		
Dominion Virginia Power	x		
Duke Energy	x		
FirstEnergy Corp.	x		
FRCC Compliance Committee	x		
Hydro One Networks, Inc.	x		
Hydro-Québec/TransÉnergie	x		
Independent Electricity SO	x		
IRC Standards Review Committee	x		
Midwest Reliability Organization	x		
NPCC Regional Standards Cmte.	x		
Oncor Electric Delivery	x		
Pepco Holdings, Inc.	x		
PSC of South Carolina	x		
SPP Operating Reliability WG	x		

**Consideration of Comments on First Draft of SAR and Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705 (Project 2008-04)**

5. If you have any other comments on the SAR or the proposed changes to comply with FERC Order 705, please provide them here.

#5 – Commenter	Comment
American Transmission Company	<p>Issue 1:            ATC interprets that changing its SOL methodology to be compliant with a new FAC-010 standard and establishing new SOLs to be compliant with the FAC-014-1 standard is separate from being compliant with the existing TPL-002-0 standard. The new FAC-010 may lead to the identification of new system operating limit violations, but compliance with TPL-002-0 still depends on dealing with the existing system performance limit violations specified in TPL-002-0.</p> <p>Therefore, mandatory compliance with FAC-010-2 would involve rewording the SOL methodology by 7/1/2008 to reflect the requirements in the standard. Mandatory compliance with FAC-014-1 by 1/1/2009 would involve recalculating and communicating any revised SOLs based on any changes that were made to the planning horizon SOL methodology. Mandatory compliance with TPL-002-0 would continue involve meeting the system performance requirements specified in this standard, until the standard is changed.</p> <p>Issue 2:            The SDT should explain why the numbering of Requirement 2.4 in FAC-011-1 and Requirement 2.3.3 in FAC-010-1 are different? Both of these two requirement contain exactly the same language but in FAC-010 is a sub-requirement of R2.3 and in FAC-011 it a sub-requirement of R2.</p>
<p><b>Response:</b> The drafting team does not see the “issue” identified in Issue 1. The implementation plan for FAC-010 and FAC-011 was not dependent on any changes made to the TPL standards. Entities are expected to comply with all applicable, approved, effective requirements.</p> <p><b>Issue 2 –</b> The two sub-requirements highlighted are not intentionally different. We modified FAC-010 so that the subrequirement has the same weight as in FAC-011.</p>	
Duke Energy	Standards TPL-001-0 through TPL-004-0 are being rewritten and consolidated into a new TPL-001-1. FAC-010-2 requirements R2.4 and R2.5 contain references to TPL-003, which will necessitate conforming changes to FAC-010-2 when TPL-001-1 is approved.
<p><b>Response:</b> When the TPL standards are revised, as envisioned, there will be conforming changes made to the FAC standards and to the ATC-related set of standards.</p>	
FirstEnergy Corp.	We suggest adding the Violation Risk Factors (VRF) to the text of each requirement in each standard [Note, this should also include adding the VRFs to FAC-014-1].



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#5 – Commenter	Comment
<p><b>Response:</b> The Commission directed NERC to modify some of the VRFs, and the filing to comply with this order has not been completed. VRFs will be added at a later date, once the entire set has been approved by the Board of Trustees and FERC.</p>	
FRCC Compliance Committee	<p>The Compliance Monitoring Responsibility should be the Regional Entity, not the Regional Reliability Organization. The RE's have the authority through their approved Delegation Agreements.</p>
<p><b>Response:</b> Agreed. This is a modification that took place following the development of these standards.</p>	
IRC Standards Review Committee	<p>The ISO RTO Council has filed a Request for Clarification or in the alternative Rehearing. We ask the NERC SDT to consider any further clarifying language FERC requests if they impact FAC-010 and FAC-011.</p> <p>Regarding Footnote (1) on both FAC-010 &amp; 011 - there is no apparent reason to include Footnote (1) as it is editorial, it is not a requirement and it adds no additional clarity. The Requirements already identify what must be studied - which is the purpose of the standard.</p>
<p><b>Response:</b> If the Commission agrees with the ISO RTO Council, then it may issue another Order directing NERC to make additional changes to the standards. At this time, the drafting team does not know when the Commission will respond to the ISO RTO Council's request for a rehearing – and the drafting team is trying to get the already identified modifications to the standards implemented before the first of these standards becomes effective on July 1, 2008.</p>	
Manitoba Hydro	<p>MH does not see a reliability need to define SOLs in the planning horizon and believes the Standard FAC-010-1 should be withdrawn. Operators do not use future SOLs, so who benefits from the extra work required to comply with this SAR?</p>
<p><b>Response:</b> Stakeholders indicated a desire to require entities to have a methodology for determining SOLs for use in the planning horizon.</p>	
Midwest ISO	<p>Yes, In the brief description section of the SAR (page SAR-2). The violation Risk Factors are suggested to be updated in accordance with FERC order 750. Isn't this FERC order 705?</p> <p>The VSL drafting team did not create VSLs for these two standards. Thus, creation of VSLs should be added to the scope of this SAR.</p>
<p><b>Response:</b> You are correct – the Order is “705”, not “750.” This has been corrected.</p>	
Midwest Reliability Organization	<p>Yes, In the brief description section of the SAR (page SAR-2). The Violation Risk Factors are suggested to be updated in accordance with FERC order 750, should be FERC Order 705.</p>
<p><b>Response:</b> You are correct – the Order is “705”, not “750.” This has been corrected.</p>	
PJM Interconnection	<p>Revision of the standards should be left up to the standard drafting team and consensus</p>

Consideration of Comments on First Draft of SAR and Revisions to FAC-010-1 and FAC-011-1 for FERC Order 705  
(Project 2008-04)

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#5 – Commenter	Comment
	of industry comments.
<b>Response:</b> NERC has an obligation to comply with the Commission's directives.	