NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standards Announcement

Project 2009-06 Facility Ratings Expansion
Ballot Pool Forming March 17 – April 16, 2011
Formal Comment Period Open March 17 – May 2, 2011

Now available at: http://www.nerc.com/filez/standards/Project_2009-06_Facility_Ratings.html

Ballot Pool Open through 8 a.m. on April 16, 2011

A ballot pool is being formed for the balloting of revisions to FAC-008-2 to address a directive from Order 693 that was not addressed in the development of FAC-008-2. The Standards Committee has authorized posting a Supplemental SAR and associated standard and implementation plan for a 45-day formal comment period with a new ballot pool formed during the first 30 days of the comment period and an initial ballot conducted during the last 10 days of that comment period. The ballot pool will be open through 8 a.m. on April 16, 2011.

Registered Ballot Body members may join the ballot pool to be eligible to vote in the upcoming ballot at the following page: https://standards.nerc.net/BallotPool.aspx

During the pre-ballot window, members of the ballot pool may communicate with one another by using their "ballot pool list server." (Once the balloting begins, ballot pool members are prohibited from using the ballot pool list servers.) The list server for this ballot pool is: bp-2009-06_FAC_RATING_in@nerc.com

Members who join the ballot pool to vote on the standard will automatically be entered in a separate pool to participate in the non-binding poll of the associated violation risk factor (VRF) and violation severity levels (VSLs).

Formal 45-day Comment Period Open through 8 p.m. on Monday, May 2, 2011

A supplemental SAR and revisions to FAC-008-2, along with an implementation plan and revisions to the associated VRF and VSLs have been posted for a formal 45-day comment period through May 2, 2011. The sole focus of this supplemental SAR and proposed revisions to FAC-008-2 – Facility Ratings is to address a directive from Order 693 that is related to FAC-008-1 and was not addressed in the development of FAC-008-2. NERC is required to file a version of FAC-008 that addresses all directives from Order 693 related to FAC-008 by June 15, 2011.

The Standards Committee has waived the initial 30-day comment period for this posting giving consideration to the fact that the issue being addressed with this new requirement in FAC-008-3 is not new – previous attempts to develop a requirement to address this directive were posted several times in 2008 and also giving consideration to the anticipated due date of June 15, 2011. The Standards Committee noted that this waiver does not conflict with ANSI's requirements since the 30-day comment period in NERC's standard development process is not required by ANSI.

Instructions for Commenting

Please use this electronic form to submit comments. If you experience any difficulties in using the electronic form, please contact Monica Benson at monica.benson@nerc.net. An off-line, unofficial copy of the comment form is posted on the project page: http://www.nerc.com/filez/standards/Project_2009-06_Facility_Ratings.html

Next Steps

An initial ballot and non-binding poll will be conducted during the final 10 days of the 45-day comment period, from Friday, April 22nd through Monday, May 2, 2011.

Background

The Facility Ratings Standard Drafting Team (FR SDT) has been tasked with creating a requirement to address an unresolved directive initially discussed in paragraphs 756 and 771 of FERC's Order 693, and further explained in paragraph 76 of FERC's "Order Denying Rehearing, Denying Clarification, Denying Reconsideration, and Denying Request for a Stay," September 16, 2010. The issues discussed in these paragraphs concern the reliability-related use of information about the most limiting piece of equipment that comprises a Facility.

In Order 693, FERC explained in paragraph 756:

> "…The Commission's proposed modification would require identifying and documenting the limiting component for all facilities and the increase in rating if that component were no longer the most limiting component; in other words, the rating based on the second-most limiting component. The Commission further clarifies that this Reliability Standard will require this additional thermal rating information only for those facilities for which thermal ratings cause the following: (1) an IROL; (2) a limitation of TTC; (3) an impediment to generation deliverability or (4) an impediment to service to major cities or load pockets."

And provided further direction in paragraph 771:

> "…we direct the ERO to develop modifications to FAC-008-1 through its Reliability Standards development process requiring transmission and generation facility owners to: (1) document underlying assumptions and methods used to determine normal and emergency facility ratings; (2) develop facility ratings consistent with industry standards developed through an open, transparent and validated process and (3) for each facility, identify the limiting component and, for critical facilities, the resulting increase in rating if that component is no longer limiting."

FERC later explained in paragraph 76 of its September 16, 2010 Order Denying Rehearing, Denying Clarification, Denying Reconsideration, and Denying Request for a Stay:

> "In order to determine facility ratings, entities must identify the most limiting component that comprises the facility, based on a validated methodology that considers the specific characteristics and ratings of all of the components to determine their limits for a range of ambient conditions, including if and for what duration these limits can be exceeded. This is, in part, because the limiting element upon which a facility rating is based can change under different operating conditions. For example, an underground high voltage cable may be the limiting element for continuous ratings, but a disconnect switch may be the limiting element for a four-hour emergency rating. With heavy power flows from generators through critical facilities to load, contingency conditions could reveal a thermal overload above the normal rating of the first limiting component of one of these facilities. However, that component also likely has a documented short time rating that could sustain the overload. If the second-most limiting component does not afford much increase in rating above the first, and its overload can result in the unintended removal of the facility from service (i.e., a relay or other protection system component that trips a facility out of service due to the overload), the prior identification of this second limiting component could alter the mitigation plans and avoid relay operations that trip facilities out-of-service, and thus potentially prevent a cascading event."

On February 24, 2011, members of the FR SDT met with NERC and FERC staff to discuss the original directive from FERC Order 693 as well as the subsequent guidance issued in the September 16, 2010 Order. The members of the FR SDT used this new information to develop the proposed revisions to FAC-008-2 that are posted for stakeholder comment and ballot.

Standards Process

The Standard Processes Manual contains all the procedures governing the standards development process. The success of the NERC standards development process depends on stakeholder participation. We extend our thanks to all those who participate.

For more information or assistance, please contact Monica Benson, Standards Process Administrator, at monica.benson@nerc.net or at 404-446-2560.

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