

## Comment Report

**Project Name:** 2017-03 FAC-008-3 Periodic Review | Team Recommendation  
Comment Period Start Date: 10/30/2017  
Comment Period End Date: 12/13/2017  
Associated Ballots:

There were 37 sets of responses, including comments from approximately 100 different people from approximately 74 companies representing 10 of the Industry Segments as shown in the table on the following pages.

## Questions

**1. The Review Team identified a number of minor clarity and consistency issues within the standard and noted them in Attachment 4 of the FAC-008-3 Periodic Review Team Preliminary Recommendation; however, the team asserts the standard is sufficient to protect reliability and meets its reliability objectives. Do you agree? If not, please provide your comments and rationale. Note: If you provide comments regarding one of the team's observations, please reference the particular observation.**

**2. The team did not identify a concern related to cost effectiveness as-drafted. Do you agree there are not any more cost effective alternatives to achieving the reliability objective(s) of the standard? If not, please provide an alternative approach with details on how it could be effectively implemented.**

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Seattle City Light	Ginette Lacasse	1,3,4,5,6	WECC	Seattle City Light Ballot Body	Pawel Krupa	Seattle City Light	1	WECC
					Hao Li	Seattle City Light	4	WECC
					Bud (Charles) Freeman	Seattle City Light	6	WECC
					Mike Haynes	Seattle City Light	5	WECC
					Michael Watkins	Seattle City Light	1,4	WECC
					Faz Kasraie	Seattle City Light	5	WECC
					John Clark	Seattle City Light	6	WECC
					Tuan Tran	Seattle City Light	3	WECC
					Laurie Hammack	Seattle City Light	3	WECC
ACES Power Marketing	Jodirah Green	6	NA - Not Applicable	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	RF
					Greg Froehling	Rayburn Country Electric Cooperative, Inc.	6	Texas RE
Entergy	Julie Hall	5,6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
DTE Energy - Detroit Edison Company	Karie Barczak	3,4,5		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Manitoba Hydro	Mike Smith	1,3,5,6		Manitoba Hydro	Yuguang Xiao	Manitoba Hydro	5	MRO

					Karim Abdel-Hadi	Manitoba Hydro	3	MRO
					Blair Mukanik	Manitoba Hydro	6	MRO
					Mike Smith	Manitoba Hydro	1	MRO
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion and ISO-NE	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Wayne Sipperly	New York Power Authority	4	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Bruce Metruck	New York Power Authority	6	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					Edward Bedder	Orange & Rockland Utilities	1	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Laura Mcleod	NB Power	1	NPCC
					David Ramkalawan	Ontario Power Generation Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Helen Lainis	IESO	2	NPCC					
Michael Schiavone	National Grid	1	NPCC					

					Michael Jones	National Grid	3	NPCC
					Greg Campoli	NYISO	2	NPCC
					Sylvain Clermont	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Michael Forte	Con Ed - Consolidated Edison	1	NPCC
					Daniel Grinkevich	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Brian O'Boyle	Con Ed - Consolidated Edison	5	NPCC
					Sean Cavote	PSEG	4	NPCC
Midwest Reliability Organization	Russel Mountjoy	10		MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Amy Casucelli	Xcel Energy	1,3,5,6	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administratino	1,6	MRO
					Kayleigh Wilkerson	Lincoln Electric System	1,3,5,6	MRO
					Mahmood Safi	Omaha Public Power District	1,3,5,6	MRO
					Brad Parret	Minnesota Power	1,5	MRO
					Terry Harbour	MidAmerican Energy Company	1,3	MRO

					Tom Breene	Wisconsin Public Service	3,5,6	MRO
					Jeremy Volls	Basin Electric Power Coop	1	MRO
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Mike Morrow	Midcontinent Independent System Operator	2	MRO
Southwest Power Pool, Inc. (RTO)	Shannon Mickens	2	SPP RE	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	2	SPP RE
					Deborah McEndaffer	Midwest Energy, Inc	NA - Not Applicable	SPP RE
					Louis Guidry	Cleco Corporation	1,3,5,6	SPP RE
					Mike Kidwell	Empire District Electric Company	1,3,5	SPP RE
					Kevin Giles	Westar Energy	1	SPP RE
					Robert Gray	Board of Public Utilities (Kansas City, KS) (BPU)	NA - Not Applicable	SPP RE

1. The Review Team identified a number of minor clarity and consistency issues within the standard and noted them in Attachment 4 of the FAC-008-3 Periodic Review Team Preliminary Recommendation; however, the team asserts the standard is sufficient to protect reliability and meets its reliability objectives. Do you agree? If not, please provide your comments and rationale. Note: If you provide comments regarding one of the team's observations, please reference the particular observation.

Mike Smith - Manitoba Hydro - 1,3,5,6, Group Name Manitoba Hydro

Answer No

Document Name

Comment

Regarding attachment 4 2) item A, there is no need to combine R1 and R2. If so the version of the standard basically goes back to FAC-008-1, in which R1 requires GO has a methodology for developing its Facility Ratings.

Likes 0

Dislikes 0

Response

Kristine Ward - Seminole Electric Cooperative, Inc. - 1,3,4,5,6 - FRCC

Answer No

Document Name

Comment

Seminole disagrees with the review team's answer for number 3 in the recommendation. As indicated in NERC's Compliance Monitoring and Enforcement Program Report for Q3 2016 published November 1, 2016 (the last published reports at the following site: <http://www.nerc.com/pa/comp/CE/Pages/Compliance-Violation-Statistics.aspx>), FAC-008 is in the top 10 for most violated Standards.

Seminole would like clarification on whether the GO for Requirement R1 is required to include relay equipment in their Facility Rating documentation. Seminole is aware that Requirement R1 under FAC-008-1 included relays and that Regions took enforcement action against GOs that did not include generator protection in their documentation. However, the reference to relays has been removed from Requirement R1, and so Seminole wishes a future drafting team to explain the rationale of removing relays from R1 but retaining it for R2 and R3.

Seminole would like to have clarification added for the responsibility of a TO or GO when it deals with tie-lines and generator interconnection facilities where a separate entity may have relay connections to the other's terminal equipment for protection purposes. For example, should the owner of the relay be required to communicate the Rating of the relay to the Facility owner?

Likes 0

Dislikes 0

Response

Robin Hill - EDP Renewables North America LLC - 5 - MRO,WECC,Texas RE,NPCC,SERC,SPP RE,RF

<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>In comparison with PRC-005-6, this Standard is not specific enough and allows for wide interpretation of it's intent and requirements. Should consider adding clarification within the Measures for R1 and R2 on presentation of the rating of different equipment shall be in MVA or KVA (apparent power rating), instead of amperes (pure current rating).</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Brian Evans-Mongeon - Utility Services, Inc. - 4</b>	
<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
<p>Our experience with audits of the FAC-008 Standard in almost all regions, has shown that the Facility Rating used by the RC(s), PC(s), TP(s), TO(s) and TOP(s) is often different than what is required by FAC-008. Many times, the methodology used for the Facility Rating has been modified to align it with the FAC-008 Requirements though this is not always the case. ISO-NE's use of their NX-12 and NX-9 ratings for generation is an example where the actual Facility Rating is determined by a process that is not compliant with the FAC-008 Standard. In these cases, the FAC-008 Standard does not have any impact on BES reliability and is only an administrative burden. We suggest that the FAC-008 Standard be written so that either the Facility Ratings actually used by the RC(s), PC(s), TP(s), TO(s) and TOP(s) be acceptable for compliance with FAC-008 or the RC(s), PC(s), TP(s), TO(s) and TOP(s) be required to accept the FAC-008-developed Facility Ratings instead of Facility Ratings that are now used.</p> <p>We also would suggest that the definitions for both Facility and Element be revised to clarify how these terms are different and relate to each other. During the 2015-04 Alignment of Terms Standard Drafting Team work, several commenters raised issues with the modifications to the Generator Owner and Generator Operator defined terms due to the AoT SDT proposal to replace "unit(s)" with "Facility(ies)" in those definitions. In the Considerations of Comments (Project201504AlignmentofGlossaryofTermsNERCRSRPDL-Consideration of Comments_090415) page 10 (posted here: <a href="http://www.nerc.com/pa/Stand/Pages/Project-2015-04-Alignment-of-Glossary-of-Terms-(NERC-Reliability-Standards-and-the-Rules-of-Procedure).aspx">http://www.nerc.com/pa/Stand/Pages/Project-2015-04-Alignment-of-Glossary-of-Terms-(NERC-Reliability-Standards-and-the-Rules-of-Procedure).aspx</a>), the SDT response was "Additionally, the drafting team notes that as part of Phase 2, the team will submit a SAR recommending revisions to the definition of "Facility." The drafting team highly encourages you to attend the next drafting team meeting, which will focus on development of the SAR and Phase 2 recommendations." This Phase 2 work was not completed; therefore, we suggest the current FAC-008-3 Periodic Review Team address this issue as part of their project.</p>	
Likes	0
Dislikes	0
<b>Response</b>	
<b>Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group</b>	
<b>Answer</b>	No



**Document Name****Comment**

The SPP Standards Review Group recommends that the Periodic Review Team suggest to the Standard Drafting Team (SDT) to develop a Guidelines Technical Basis (GTB) document in reference to FAC-008-3. A GTB would provide clarity on what were the drafting team's intents while developing requirements for Generator Facility Ratings.

Likes 0

Dislikes 0

**Response**

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

**Answer**

No

**Document Name****Comment**

Texas RE appreciates the Periodic Review Team's efforts to review the FAC-008-3 Standard. Developing Facility Ratings through a well-documented process that identifies and correctly rates the most limiting series element plays an important role in avoiding operating generation and transmission facilities in excess of their actual equipment capacity, reducing the opportunity for equipment damage, outages, and loss of generation and load. Ensuring accurate Facility Ratings also supports situational awareness by ensuring that Reliability Coordinators have accurate operational data for its real-time demand models, contingency analyses, and system planning analyses. Texas RE has noted issues in this area. Over the past two years, Texas RE has processed 14 moderate risk issues related to inaccurate Facility Ratings. Further, the Texas RE risk group has included accurate Facility Ratings as a risk element for upcoming compliance engagements.

In auditing and enforcing the current FAC-008-3 Standard, Texas RE shares the Periodic Review Team's view that FAC-008-3 is currently sufficient to meet these important reliability goals. In particular, the bulk of issues Texas RE has addressed fall under FAC-008-3 R6, R7, and/or R8. That is, they focus on developing Facility Ratings that are not consistent with an entity's Facility Rating Methodology, usually because the calculated Facility Rating is not consistent with the most limiting series element, or they address the provision of accurate Facility Ratings to the Reliability Coordinator.

As the Periodic Review Team has recognized, however, there are opportunities to further improve the existing FAC-008-3 Standard. In particular, the Facility Rating Methodology aspects of the existing Standard set forth in FAC-008-3 R1 and R2 for Generator Owners and FAC-008-3 R3 for Transmission Owners could use further enhancement and clarification. In Texas RE's experience, registered entities often rely solely on minimal documentation in establishing their Facility Rating methodologies. Such documentation may merely state one or several appropriate rating methods and include statements that the ultimate Facility Rating will be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable equipment rating of the individual equipment that comprises that facility. While such documentation is technically compliant, it does not always lead to a process to ensure development of accurate Facility Ratings.

In potentially revising the Standard, the Periodic Review Team may wish to provide additional clarity around the expectations for Facility Rating Methodology documentation. For example, the Periodic Review Team could recommend that a future project clarify the scope of equipment that should be included in developing Facility Ratings for all requirements and not merely those elements subject to FAC-008-3 R2. The Periodic Review Team could also recommend additional clarity around the types of operating limitations that should be considered to determine Equipment Ratings. These

improvements should lead to improved Facility Rating Methodology documentation, reducing the numbers of Facility Ratings issues that Texas RE has identified.

Texas RE also suggests reviewing the definition of Thermal Rating as there are terms within that definition, such as Transmission Line and Facility that are defined and should be capitalized.

Texas RE disagrees with removing shunt compensation devices on the basis that there are no thermal ratings and therefore not considered in the Facility Rating as limiting equipment. There are different types of Facility Ratings based on the Equipment Ratings such as a voltage rating, a MW rating, a MVar rating, a stability rating, etc. The definitions of System Operating Limit and Interconnection Reliability Operating Limit includes several types of Facility Rating which should be considered by part 8.2.

Likes 0

Dislikes 0

### Response

**Thomas Foltz - AEP - 3,5**

**Answer**

Yes

**Document Name**

**Comment**

AEP agrees with the team's assertion that the standard is sufficient to protect reliability and meets its reliability objectives.

The FAC-008 RSAW focuses the auditor's attention to "series-connected devices". If "series-connected equipment" is the intended focus of FAC-008, then to align the Standard and RSAW, "series-connected equipment" should be explicitly reference throughout the Standard.

AEP has no objections to the potential revisions/corrections in Attachment 4, with the possible exception of item 10 on page 20. Item 10 considers removing "shunt compensation devices" from the list of equipment in R2 Part 2.4 and R3 Part 3.4. Shunt devices need to be properly modeled to reliably operate the system; however, they have no impact whatsoever on the rating of series-connected devices.

Likes 0

Dislikes 0

### Response

**Chris Scanlon - Exelon - 1,3,5,6**

**Answer**

Yes

**Document Name**

**Comment**

The Exelon companies agree with the EPR teams recommendations and thank the team for their work.

Likes 0

Dislikes 0

**Response****Neil Swearingen - Salt River Project - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

SRP supports the recommendations of the PRT in Attachment 4, but SRP also sees a potential improvement in the clarity of R6. The current language requires entities to “have Facility Ratings” and the intent appears to be for entities to “establish and maintain Facility Ratings”.

Likes 0

Dislikes 0

**Response****Jeanne Kurzynowski - Consumers Energy Company - 1,3,4,5 - RF**

**Answer**

Yes

**Document Name**

**Comment**

Please consider the following comments:

- Part 2-C – I agree with the proposed revision for R3. The term “methods” clarifies the requirement.
- Part 2-D – I agree with the proposed revision for R3. The term “methods” clarifies the requirement.
- Part 2-E – I agree with the proposed revision for R3. This clarifies the requirement.
- Part 2-G – I agree with the change in wording; this makes the data request less burdensome on the parties involved.
- Part 10-A – I strongly agree with removing shunt compensation devices from the equipment list. As cited in the explanation, this equipment is not in-series with the system and can therefore be removed from consideration in determining Facility Ratings.

Likes 0

Dislikes 0

**Response**

**Julie Hall - Entergy - 5,6, Group Name** Entergy

**Answer** Yes

**Document Name**

**Comment**

Recommend Team Observations 2B, 2C, 2D, 2E, 2F, 2G, 4A, 5A, 5C, 5D, 5E, and 10A. Entergy agrees with the rational provided by the drafting team to address clarity, consistency, and aligning the compliance elements.

Recommend making the language (of the three bullets) referencing industry groups in Requirement R1 Part 1.1 consistent with Requirement R2 Part 2.1 and Requirement 3 Part 3.1. Entergy agreed with Team Observation 5B for consistency, but wanted to ensure that R1 Part 1.1 is made consistent with the content within R2 Part 2.1 and R3 Part 3.1.

Recommend making the language in Requirement R1 Part 1.2 consistent with Requirement R2 Part 2.3 and Requirement R3 Part 3.3. The rational for making the change to Requirement R1 Part 1.2 is to improve clarity and consistency with Requirement R2 Part 2.3 and R3 Part 3.3.

Recommend the language in Requirement R1 be changed from

Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facility(ies) up to the low side terminals of the main step up transformer....

to

Each Generator Owner shall have a documented methodology for determining the Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment between the generator and the low side terminals of the main step up transformer....

The rational for making the change is to clarify the scope of equipment and to align with the scope of equipment identified in Requirement R2 and R3.

Recommend the language in Requirement R1 Part 1.1 be changed from

The documentation shall contain assumptions used to rate the generator and at least one of the following:

to

The methodology used to establish the series connected Equipment Ratings shall be consistent with at least one of the following:

The rational for making the change is to follow up with Team Recommendation 10A regarding series connected equipment. The language adds additional clarity for the scope of the equipment and the ratings method.

Recommend the language in Requirement R2 Part 2.1 be changed from

The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

to

The methodology used to establish the series connected Equipment Ratings shall be consistent with at least one of the following:

The rational for making the change is to follow up with Team Recommendation 10A regarding series connected equipment. The language adds additional clarity for the scope of the equipment and the ratings method.

Recommend the language in Requirement R3 Part 3.1 be changed from

The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:  
to

The methodology used to establish the series connected Equipment Ratings shall be consistent with at least one of the following.

The rationale for making the change is to follow up with Team Recommendation 10A regarding series connected equipment. The language adds additional clarity for the scope of the equipment and the ratings method.

Likes 0

Dislikes 0

### Response

**Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name** ACES Standard Collaborations

**Answer**

Yes

**Document Name**

### Comment

Clarity

A. Requirement R1 and Requirement R2: It is agreed that these two requirements could be combined. One additional item to note for consideration is that R1 carries a Violation Risk Factor of Lower while R2 carries a Violation Risk Factor of Medium. The Violation Risk Factor will also need to be addressed if the requirements are combined.

B. Requirement R2 and Requirement R3: It is not agreed that reordering R2 and R3 should be considered. Reordering could lead to an unintended consequence of an entity to miss the most limiting Equipment Rating of the individual equipment that comprises the Facility.

All other potential improvements are agreeable without further comment.

Likes 0

Dislikes 0

### Response

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name** Seattle City Light Ballot Body

**Answer**

Yes

**Document Name**

### Comment

On Behalf of City Light SME:

The standard is adequate as is, but City Light would like to see it clarified whether maximum voltage (or other non-thermal) ratings are expected as part of FAC-008 compliance. The NERC definition of Facility Ratings includes max/min voltage and frequency. Also, some supporting documentation for other standards related to SOLs has seemed to expect voltage ratings to have been established through FAC-008. In practice, however, City Light has never seen max/min voltage or frequency ratings as part of any entity's FAC-008 documentation and it has never come up as an issue in audit. These different types of Facility Ratings should be mentioned somewhere in the FAC-008 standard, even if just to say that it should be addressed by the entity's Facility Rating Methodology.

Likes 0

Dislikes 0

### Response

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

Answer

Yes

Document Name

### Comment

The following comment is with regard to potential improvements noted by the drafting team in "Attachment 4":

Item 2) B. – Requirements R2 and R3: We agree with the review team's observation regarding a reordering of the sub-parts of R2 and R3 in a more logical order. However, for entities that have formatted their methodology documents around the current ordering, this could create document revisions simply to match a new arrangement of the same information.

Likes 0

Dislikes 0

### Response

#### David Ramkalawan - Ontario Power Generation Inc. - 5

Answer

Yes

Document Name

### Comment

OPG is of the opinion that clarification is recommended with respect to why the non-thermal limitation factors like voltage ratings are not considered as part of the Facility Ratings methodology. This has a direct impact in removal of the shunt compensation devices on the basis that there are no thermal ratings, when considering the limiting equipment for the Facility Rating.

Likes 0

Dislikes 0

### Response

**Gregory Campoli - New York Independent System Operator - 2****Answer** Yes**Document Name****Comment**

However, the SRC believes that if a standard is adequate or not broken, let it ride, the project should not continue to simply apply mini fixes.

Likes 0

Dislikes 0

**Response****George Brown - Acciona Energy North America - 5****Answer** Yes**Document Name****Comment**

I agree with the teams assessment. My concern resides with NERC Reliability Standard FAC-008-3 Facility Ratings (NERC FAC-008), Requirement R2 and R3 (R2 & R3) versus RSAW Compliance Assessment Approach Specific to FAC-008-3 (RSAW FAC-008), R2 & R3, Row 6. The RSAW FAC-008 R2 & R3, table row 6 contains a statement that is a requirement. My comments to the FAC-008-3 Periodic Review Team are not to debate whether or not this statement is a requirement, but rather if this statement is necessary to support the reliable operation of the Bulk Electrical System then it needs to be included within the Reliability Standard as a requirement as outlined in the Standard Processes Manual.

The RSAW FAC-008 R2 & R3, table row 6 statement that is a requirement is as follows:

For reply *[sic]* protective devices, the rating is *[sic]* the threshold of loadability whereby the relay can safely operate without risking failure of the relay. The relay trip setting is not the facility rating under FAC-008-3 unless the trip setting is the most limiting factor of the facility.

The aforementioned statement is clearly a methodology requirement on how relay protective devices shall be rated. However, being that it is located in the RSAW and not in the currently effective NERC FAC-008 makes this statement an unenforceable requirement.

NERC FAC-008 Requirement R2 & R3 require applicable entities to develop a Facility Ratings methodology (FRM) that contains four discrete areas:

1. Method for rating (Requirement R2.1 & R3.1)
2. Assumptions and the like used to develop the rating (Requirement R2.2 & R3.2)
3. A statement on respecting the most limiting element (Requirement R2.3 & R3.3)
4. Scope of equipment and scope of ratings (Requirement R2.4 & R3.4)

None of the aforementioned enforceable requirements are prescriptive to what method an applicable entity must use to rate their relay protective devices, in fact these allow the entity the latitude to rate its equipment based the FRM developed by the entity.

A determination needs to be made to whether RSAW FAC-008 R2 & R3, Part 6 statement of reference is necessary for reliable operation of the BES and should be a requirement. If it is determined that this is in fact the case, then a recommendation should be made to that effect. If it is not the case

then a recommendation should be made for the removal of the referenced statement from the RSAW FAC-008, as it is a requirement located within the RSAW.

Likes 0

Dislikes 0

## Response

### Douglas Webb - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - SPP RE

Answer

Yes

Document Name

## Comment

KCP&L agrees FAC-008-3 is sufficient to protect reliability and meet the reliability objective of the standard; however, the company identified some of the PRT's proposed recommendations as "concerning." As such, we felt a responsibility to, at the very least, highlight these concerns for the PRT and provide the team an opportunity to revisit the recommendations identified.

Additionally, the company's concerns generally arise, not from the current FAC-003 Standard's language but from the proposed recommendations offered and how, on their face, seemingly do not consider important and impactful elements of the Requirements.

Finally, the company recognizes commenting on the proposed recommendations at this juncture may be too late in the periodic review process for the PRT to reconsider the proposed recommendations. Notwithstanding, KCP&L appreciates the PRT's consideration of our concerns.

### **2A: Requirement R1 and Requirement R2:**

KCP&L disagrees with the recommendation.

1. The purpose statement of FAC-008-3 should be reconsidered based on the current work in process related to System Operating Limits. There appear to be opportunities to clarify and apply consistent interpretation of key principles in doing this.
2. Generator ratings may not equal the generator capability, although the generator ratings are captured in the transmission planning models. There are differences in approach and components that are valid, thus should not be synchronized or consolidated without careful consideration.

### **2.B: Requirement R2 and Requirement R3:**

We agree with the recommendation but view the change as administrative and not strengthening reliability to support acting on the recommendation.

### **2.C: Requirement R2, Part 2.1 and Requirement R3, Part 3.1:**

#### **Methodologies are Unique and often Differ between GO and TO.**

Replacing "methodology" with "methods" does not recognize scenarios that would make such a revision impractical. Here are some examples:

- An entity registered as a GO and TO can or may have two different methodologies—one for generation and one for transmission.
- The need for separate methodologies is paramount in situations when the registered GO and TO are different entities.
- It is not unusual for multiple, distinct, GOs to be interconnected with a single TO.
- A GO may require different methodologies when interconnected with TOs within multiple geographic areas.



## **2.D: Requirement R2, Part 2.2 and Requirement R3, Part 3.2:**

We agree with the recommendation but view the change as administrative and not strengthening reliability to support acting on the recommendation..

## **2.E: Requirement R2, Part 2.2.1 and Requirement R3, Part 3.2.1:**

**R2.2.1 / R3.2.1 Are Not Duplicative of R2.1 / R3.1:** Granted, portions of information may be similar in executing these Requirements but there is a subtle distinction to be made:

R2.1 / R3.1 is “how” you are going to look to establish the ratings.

R2.2.1 / R3.2.1 is “what” you are going to rely upon executing the “how.”

## **2.F: Requirement R2, Part 2.4 and Requirement R3, Part 3.4:**

We agree with the recommendation but view the change as administrative and not strengthening reliability to support acting on the recommendation.

## **2.G: Requirement R7 and Requirement R8, Part 8.1:**

**Assumes Agreement Between TO and GO:** Regardless of whether it is a reasonable practice or beneficial to either entity for a TO and GO not to “mutually agree upon a schedule,” the current FAC-008 language considers the possibility—that the TO and GO refuse to mutually agree on a schedule.

In such a case, the “compliance burden” is a minor consideration to the market and delivery implications of removing the requesting entities’ scheduling leverage.

## **5.A: Requirement R1, Part 1.1:**

We suggest further study of this recommendation. A question comes to mind, “Why was the requirement initially written the way it is represented today?” Further consideration and supporting documentation may be prudent before support can be garnered for this recommendation.

## **5.B: Requirement R1, Part 1.1, Requirement R2, Part 2.1, Requirement R3, Part 3.1:**

We agree with the recommendation but view the change as administrative and not strengthening reliability to support acting on the recommendation..

## **5.C: Requirement R1, Part 1.2, Requirement R2, Part 2.3, Requirement R3, Part 3.3:**

**Creates Compliance Ambiguity:** “Do not exceed” is plain and unambiguous. The recommended word, “respect” is widely open to interpretation. These concepts may apply differently to TO and GO ratings. Would support consistency with the GO elements but this recommendation requires further discussion to determine an appropriate approach. We agree that “do not exceed” may be too restrictive based on intent.

## **5.D: Requirement R2, Part 2.1 and Requirement R3, Part 3.1:**

**KCP&L does not agree with this recommendation.**

**Not an Equivalent Substitution:** Within the context of FAC-008-3, NERC Glossary Term, “Equipment Ratings” is not equivalent to “...Ratings of the equipment that comprises the Facility(ies)...”

The methodology sought under R2, Part 2.1 and R3, Part 3.1 is operationally focused; seeking to identify operational limits under specific conditions.

The term, “Equipment Ratings” is without consideration of operating under specified conditions.

## **10.A: Requirement R2, Part 2.4 and Requirement R3, Part 3.4:**

KCP&L agrees with this recommendation.

Likes 0

Dislikes 0

**Response**

**Bob Solomon - Hoosier Energy Rural Electric Cooperative, Inc. - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Leonard Kula - Independent Electricity System Operator - 2**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Ruth Miller - Exelon - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Becky Webb - Exelon - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**John Bee - Exelon - 1,3,5,6**

Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Laura Nelson - IDACORP - Idaho Power Company - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Douglas Johnson - American Transmission Company, LLC - 1</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE</b>	
Answer	Yes
Document Name	
<b>Comment</b>	
Likes 0	

Dislikes 0

**Response**

**Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and ISO-NE**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,SPP RE,RF**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2**

**Answer** Yes

<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	

2. The team did not identify a concern related to cost effectiveness as-drafted. Do you agree there are not any more cost effective alternatives to achieving the reliability objective(s) of the standard? If not, please provide an alternative approach with details on how it could be effectively implemented.

David Ramkalawan - Ontario Power Generation Inc. - 5

Answer No

Document Name

Comment

OPG is of the opinion that, although not identified as a concern by the Review Team in the Periodic Review Report FAC-008-3 Facility Ratings, Question I Quality, 7.b., the cost effectiveness can potentially be improved.

Mutually agreed schedule for submitting facility ratings as identified in the Attachment 4: Potential Revision/Corrections at #2 G., can reduce compliance burden and actually improve the cost effectiveness of the standard.

OPG is of the opinion that the standard revision prioritization in accordance with the actual impact is warranted, based on the 2016 NERC CMEP Annual Report suggestion that FAC-008-3 was commonly violated in 2016, although in discrepancy with the actual graphic representation within the same report.

Likes 0

Dislikes 0

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion and ISO-NE

Answer No

Document Name

Comment

Potential Revisions/Corrections 2) Clarity – G. R7 and R8, Part 8.1.

Better alignment on schedules for submitting facility ratings could reduce the number of administrative violations and make FAC-008 more cost effective.

FAC-008 is a commonly violated standard that is often the subject of auditor areas of concern and recommendations as referenced in the 2016 NERC CMEP Annual Report. We recommend that the FAC-008 standard be prioritized for revision.

Likes 0

Dislikes 0

Response

Robin Hill - EDP Renewables North America LLC - 5 - MRO,WECC,Texas RE,NPCC,SERC,SPP RE,RF



<b>Answer</b>	No
<b>Document Name</b>	
<b>Comment</b>	
Related to comments provided on Question 1, if interpreted conservatively, could lead to significant time expenditure to fulfill requirements of the Standard.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Jodirah Green - ACES Power Marketing - 6 - NA - Not Applicable, Group Name ACES Standard Collaborations</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Thank you for the opportunity to comment.	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Douglas Webb - Great Plains Energy - Kansas City Power and Light Co. - 1,3,5,6 - SPP RE</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>George Brown - Acciona Energy North America - 5</b>	
<b>Answer</b>	Yes
<b>Document Name</b>	

**Comment**

Likes 0

Dislikes 0

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

Yes

**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Elizabeth Axson - Electric Reliability Council of Texas, Inc. - 2****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**

**Aubrey Short - FirstEnergy - FirstEnergy Corporation - 1,3,4**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Ginette Lacasse - Seattle City Light - 1,3,4,5,6 - WECC, Group Name Seattle City Light Ballot Body**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Allie Gavin - International Transmission Company Holdings Corporation - 1 - MRO,SPP RE,RF**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

Response

**Brad Harris - CenterPoint Energy Houston Electric, LLC - 1 - Texas RE**

Answer Yes

Document Name

Comment

Likes 0

Dislikes 0

**Response**

**Douglas Johnson - American Transmission Company, LLC - 1**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP RE, Group Name SPP Standards Review Group**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Julie Hall - Entergy - 5,6, Group Name Entergy**

**Answer**

Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Neil Swearingen - Salt River Project - 1,3,5,6 - WECC****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****John Bee - Exelon - 1,3,5,6****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response****Becky Webb - Exelon - 1,3,5,6****Answer** Yes**Document Name****Comment**

Likes 0

Dislikes 0

**Response**

**Ruth Miller - Exelon - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Chris Scanlon - Exelon - 1,3,5,6**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Glen Farmer - Avista - Avista Corporation - 1,3,5**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Richard Jackson - U.S. Bureau of Reclamation - 1,5**

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Russel Mountjoy - Midwest Reliability Organization - 10, Group Name MRO NSRF</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
<b>Leonard Kula - Independent Electricity System Operator - 2</b>	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0

**Response**

**Karie Barczak - DTE Energy - Detroit Edison Company - 3,4,5, Group Name DTE Energy - DTE Electric**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Mike Smith - Manitoba Hydro - 1,3,5,6, Group Name Manitoba Hydro**

**Answer** Yes

**Document Name**

**Comment**

Likes 0

Dislikes 0

**Response**

**Bob Solomon - Hoosier Energy Rural Electric Cooperative, Inc. - 1**

**Answer** Yes



<b>Document Name</b>	
<b>Comment</b>	
Likes 0	
Dislikes 0	
<b>Response</b>	
<b>Rachel Coyne - Texas Reliability Entity, Inc. - 10</b>	
<b>Answer</b>	
<b>Document Name</b>	
<b>Comment</b>	
Texas RE does not have comments on the question.	
Likes 0	
Dislikes 0	
<b>Response</b>	