

Technical Rationale

Project 2021-08 Modifications to FAC-008 Reliability Standard FAC-008-6 | September 2023

FAC-008-6 Facility Ratings

Rationale for Requirement R1

The Standard Drafting Team (SDT) extensively reviewed R1 and associated standards where there may be potential overlap. While there are similar requirements in other standards, FAC-008 is the only Standard that focuses on thermal rating capabilities for Generators and their associated Elements.

Regarding the initial Standard Authorization Request (SAR) requesting clarity on the inclusion of mechanical components in the documentation for R1, the SDT has determined mechanical components may be included in the entity's R1 documentation and therefore they may be included in the entity's Facility Ratings. The SDT notes that the absence of mechanical components does not indicate non-compliance with FAC-008.

The SDT has determined no changes to R1 are warranted at this time.

Rationale for Requirement R6

The addition of the subparts in R6 addresses item 1 of the SAR Project Scope regarding any uncertainty in the responsibilities and the development of a single Facility Rating for jointly owned Facilities. The SDT recognizes there are 2 different scenarios of "jointly owned" that can occur within the confines of FAC-008 Facilities and has addressed these instances within the subpart.

- Scenario 1: Split ownership- Entities have shared ownership of a Facility where ownership of specific Elements that make up the Facility are solely owned by one entity and ownership changes over a line of demarcation.
- Scenario 2: Joint ownership- Entities share ownership of individual Element(s)

The inclusion of the wording "*accurately identifying the rating of the most Limiting Element(s)*" in part addresses item number 3 of the SAR Project Scope to ensure Requirement 6 is viewed as a risk-based Requirement. The addition focuses R6 on the risk posed to the Bulk Electric System (BES) when there is a discrepancy found in the most Limiting Element of a Facility Rating.

Many Entities expressed concerns with the term "*consistent*" within R6. The SDT maintains the addition of "*accurately identifying the rating of the most Limiting Element(s)*" in addition to the inclusion of the processes defined in R9 addresses the ambiguity of the term "*consistent*" in R6.

Rationale for Requirement R9

While the changes in R6 focus on the risk to the BES when there is a discrepancy in determining the overall Facility Rating, it does not focus on maintaining data integrity outside of the most Limiting Element. The addition of R9 ensures entities correct discrepancies found in Equipment Ratings in accordance with their own documented process. The extent of condition review ensures potential systemic errors are discovered when a discrepancy is found. This allows entities the freedom to make necessary corrections to Equipment Ratings that do not affect the most Limiting Element within their own process without the administrative overhead of self-reporting.

This requirement supports the culture of continuous improvement of Facility Ratings and encourages internal controls and active change management.