

Consideration of Comments

Five-Year Review of FAC-003-3, FAC-008-3, FAC-010-2.1, FAC-011-2, FAC-013-2, and FAC-014-2

The Project 2010-02 FAC Five-Year Review Team (FYRT) thanks all commenters who submitted comments on the FAC-003-3, FAC-008-3, FAC-010-2.1, FAC-011-2, FAC-013-2, and FAC-014-2 five-year review recommendations. The reviews were posted for a 45-day comment period from August 1, 2013 through September 16, 2013. Stakeholders were asked to provide feedback on the reviews and associated documents through a special electronic comment form. There were 21 sets of responses, including comments from approximately 69 different people from approximately 54 companies representing 9 of the 10 Industry Segments as shown in the table on the following pages.

A vast majority of commenters supported the recommendations of the FYRT. Below, the team considers and responds to both comments from stakeholders and recommendations from the Independent Experts Review Project (IERP). Responses to stakeholder comments that simply repeated the recommendations of the IERP can be found in the chart that includes IERP recommendations and the FYRT responses.

FAC-003-3 Comments

- Some commenters stated that FAC-003-3 should not have been reviewed because it was not yet approved by FERC. The FYRT maintains that the changes in FAC-003-3 were so surgical compared to the previous version that applying the FYRT recommendations to the previous version would not have been difficult. Regardless, FAC-003-3 was approved by FERC in an order issued on September 19, 2013.
- One commenter opposed the “clear line of sight” language in FAC-003-3. The FYRT points out that the language in FAC-003-3 was thoroughly vetted by the industry during the formal development of Project 2010-07: Generator Requirements at the Transmission Interface, adopted by NERC’s Board of Trustees, and approved by FERC in September 2013.

FAC-008-3 Comments

- Some commenters found the subrequirements in FAC-008-3 too prescriptive for inclusion in a standard and recommended retiring them or moving them to a guideline. Others commented that the requirements are inconsistent with regional Facility Ratings requirements, requiring entities in some regions to develop and document two different Facility Ratings methodologies. The FYRT finds that the requirements in FAC-008-3 are written to allow flexibility in developing a Facility Ratings methodology. A FYRT member within the ERCOT footprint confirmed that ERCOT’s processes do not require separate methodologies to be developed, as suggested by the

commeter, and without knowing details about NX-9 and NX-12 (Facility Ratings documents used in ISO New England), the FYRT cannot comment on the additional burden that might be created in complying with the NX documents and FAC-008-3. The majority of commenters support the reaffirmation of FAC-008-3, as does the IERP, so the FYRT continues to recommend reaffirmation. Some clarifying changes could improve the quality rating of the FAC-008-3 requirements, but the FYRT agrees with the IERP that the content rating of the FAC-008-3 requirements is high.

- Some commenters recommended that “terminal equipment” be defined in the standard, not in a modified RSAW. The FYRT points out that NERC’s Compliance staff is currently working to incorporate the content of most CANs into RSAWs for the standards in question. In this case, the FAC-008-3 RSAW is one of many RSAWs being revised, and NERC Compliance staff has committed to incorporating a clarification to “terminal equipment” in the updated version of the RSAW. (The FYRT notes that this new version of the FAC-008-3 RSAW is still being drafted, which is why it does not appear on the RSAW web page.) In the future, a clarification to “terminal equipment” could be incorporated into the text of the FAC-008-3 standard, but the FYRT believes that the RSAW modification is an appropriate clarification at this time, and makes best use of industry resources. The FYRT will also alert Compliance staff to the error in the footnote on the current RSAW for FAC-008-3. With respect to the comment about CAN-0009, the FYRT notes that NERC Compliance staff is the process of reviewing all CANs and is aware that FAC-009-1 is inactive.
- Some commenters believe FAC-008-3, R1, R2, and R3 could be improved with additional consolidation and consistency. The FYRT believes that the “inconsistencies” are by design, and that the different word choices in the requirements were deliberate. Some clarifying changes could improve the quality rating of the FAC-008-3 requirements, but, again, the FYRT agrees with the IERP that the content rating of the FAC-008-3 requirements is high.
- One commenter recommended modifying FAC-008-3 to address applicability to dispersed generation. The FYRT notes that the BES definition drafting team is working to determine how dispersed generation will be impacted by the threshold criteria for generation, but the FYRT does not believe that the BES decision in Phase 2 will impact FAC-008-3.
- One commenter pointed out an apparent typographical error in the Data Retention section of FAC-008-3. NERC staff will look into this error and, if necessary, correct it.

FAC-013-2 Comments

- One commenter suggested that FAC-013-2 should not apply to ERCOT. The FYRT notes that when FAC-013-2 was approved in 2011, FERC denied ERCOT’s request for exemption (http://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20Approving_Rel_Std_Fac-013-2_2011.11.17.pdf). It is not within the scope of this FYRT to pursue an exemption when FERC has already denied it.
- Another commenter suggested that R1.2, R1.3, R2, R5, and R6 be retired under P81 criteria. The FYRT believes that a Transfer Capability assessment should include confirmation that the

assessment respects known System Operating Limits (SOLs) (R1.2). It is possible to come up with a Transfer Capability number that violates known SOLs. An explicit statement that the known SOLs were considered in the calculation of Transfer Capability gives the user confidence in that value. Similarly, a Transfer Capability assessment should include confirmation that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices (R1.3). As explained in the FYRT recommendation, although R2 is not a competency-, risk-, or performance-based requirement, the FYRT recommends retaining it since it supports R5. Receiving entities cannot understand the assessments they receive in R5 and R6 if they have not previously received the methodology for conducting those assessments. R5 is a performance-based requirement; it describes the performance of a particular action. It requires that Planning Coordinators make assessment results available to those entities affected by the assessment. R6 is a performance-based requirement; it describes the performance of a particular action. It requires that Planning Coordinators provide, to affected entities that request it, the data to support their assessments. The FYRT believes that all of these requirements should be retained.

FAC-010-2.1, FAC-011-2, FAC-014-2 Comments

- One commenter recommended a preliminary review of all three standards before FERC acts on the TOP and TPL standards. The FYRT continues to believe that it is a better use of a review team's time and stakeholder reviewer resources to delay a full review of FAC-010, FAC-011, and FAC-014 until FERC acts on the TOP and TPL standards. The team does not believe that a reliability gap is created by delaying the review of these standards because the standards will remain enforced until they are reviewed. Even a preliminary review would be subject to change depending on those FERC actions, so the FYRT appropriately prioritized work on those standards for which it can take immediate action. Full review of FAC-010, FAC-011, and FAC-014 will be considered as the Standards Committee prioritizes its work for next year.
- One commenter recommended that the review not be delayed at all, stating that there is no clear overlap with the TOP and TPL standards. The FYRT disagrees. As stated in the original recommendation, FAC-010-2.1, FAC-011-2, and FAC-014-2 were written from the context of the concepts found in the TOP and TPL standards in existence at the time. Since that time, significant changes have taken place in both families of standards. For instance, the TPL standards have expanded to the extent that may render some portions of FAC-010-2.1 as either obsolete or redundant. And the new TOP standards have changed significantly, focusing more on sharing data, performing Operational Planning Analyses, and ensuring acceptable performance day-ahead. These significant changes in TOP and TPL standards – as well as changes in approaches to writing these standards – necessitates revisiting FAC-010-2.1, FAC-011-2, and FAC-014-2 from a holistic and fundamental perspective in light of these changes.
- Some commenters believe that these standards may have redundancies with FAC-010-2.1 and the TPL standards. The FYRT agrees, which is why it is proposing to delay review of FAC-010-2.1

(along with FAC-011-2 and FAC-014-2) until FERC issues a final order on the proposed TPL-001-4.

- One commenter expressed concern with the use of the term “Remedial Action Plans.” The FYRT suspects that the use of “Remedial Action Plans” is a typo, and will pass the feedback on to the team that reviews FAC-010, FAC-011, and FAC-014.
- Some commenters offered suggestions to improve the standards when their review takes place. The FYRT thanks them and will pass the suggestions on to the review team.

	IERP Recommendation	FYRT Response
FAC-008-3	The IERP notes a few opportunities for improvement or clarification and suggests that R7 and R8 be combined to reference both the Generator Owner and the Transmission Owner.	The FYRT recognizes that some clarifying changes could improve the quality rating of the FAC-008-3 requirements, but the FYRT agrees with the IERP that the content rating of the FAC-008-3 requirements is high and that revisions are not necessary at this time.
FAC-013-2	This Standard could be combined with MOD-001 (TOP and TSP in operations horizon). If MOD -001, -028, -029 and -030 are retired, there is a gap for the near term operating horizon. Review MODs for proper language to pull into a revised FAC-013-3 that addresses Board the near term planning horizon and the operational planning horizon.	Because the MOD A project, which is developing a new MOD-001, is still undergoing formal development, the FAC FYRT believes that it is premature to modify FAC-013-2 based on the revisions that might be implemented by the MOD A drafting team. The FAC FYRT Standards Developer will work with the MOD A Standards Developer to determine if the combination of MOD-001, MOD-028, MOD-029, and MOD-030 into one standard could create a gap with respect to FAC-013-2.
FAC-013-2	Review "transfer capability" and "total transfer capability" - these seem to be redundant or difference is not clear. Use of the term "transfer capability" should be revised to TTC.	Both TC and TTC are defined terms in the NERC glossary. The FYRT agrees that the definitions of the two terms are very similar, but does not believe that this poses a reliability concern;

		the terms can be used interchangeably. This concern does not warrant a revision of the standard.
FAC-013-2, R2, R5, and R6	Retire R2 under P81; consolidate R2, R5, and R6	As explained in the FYRT recommendation, although R2 is not a competency-, risk-, or performance-based requirement, the FYRT recommends retaining it since it supports R5. Receiving entities cannot understand the assessments they receive in R5 and R6 if they have not previously received the methodology for conducting those assessments. R5 is a performance-based requirement; it describes the performance of a particular action. It requires that Planning Coordinators make assessment results available to those entities affected by the assessment. R6 is a performance-based requirement; it describes the performance of a particular action. It requires that Planning Coordinators provide, to affected entities that request it, the data to support their assessments. The FYRT believes that all of these requirements should be retained.
FAC-010-2.1, FAC-011-2, FAC-014-2	The IERP has a number of suggestions for improvements to these standards.	The FYRT believes all IERP recommendations related to these standards should be considered when they undergo formal review.

All comments submitted may be reviewed in their original format on the [project page](#).

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, Mark Lauby, at 404-446-2560 or at mark.lauby@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Standard Processes Manual: http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf

Index to Questions, Comments, and Responses

1. As explained in more detail in the Five-Year Review Recommendation to Affirm FAC-003-3, the FYRT believes that FAC-003-3 includes technically justified, clear requirements and recommends affirming it. Do you agree that FAC-003-3 should be affirmed? If not, please explain. (Note that if FERC does not approve FAC-003-3, this recommendation will apply to FAC-003-2.)..... 13
2. As explained in more detail in the Five-Year Review Recommendation to Affirm FAC-008-3, the FYRT believes that FAC-008-3 includes technically justified, clear requirements and recommends affirming it, with some clarifying modifications to the FAC-008-3 Reliability Standard Audit Worksheet. Do you agree that FAC-008-3 should be affirmed? If not, please explain..... 17
3. As explained in more detail in the Five-Year Review Recommendation to Affirm FAC-013-2, the FYRT believes that FAC-013-2 includes technically justified, clear requirements and recommends affirming it. Do you agree that FAC-013-2 should be affirmed? If not, please explain..... 23
4. As explained in more detail in the Five-Year Review Recommendation to Delay Review of FAC-010-2.1, FAC-011-2, and FAC-014-2, the FYRT believes that all three standards require revision to add clarity and remove redundancy with the newly revised TOP and TPL standards, but that a thorough review of these standards should be delayed until FERC acts on TOP-001-2, TOP-002-3, TOP-003-2, and TPL-001-4. Do you agree that review of FAC-010-2.1, FAC-011-2, and FAC-014-2 should be delayed? If not, please explain. 27
5. If you have any other comments on the FAC Five-Year Review Recommendations that you have not already mentioned above, please provide them here..... 31

Group/Individual	Commenter	Organization	Registered Ballot Body Segment																																																					
			1	2	3	4	5	6	7	8	9	10																																												
12. Michael Lombardi	Northeast Power Coordinating Council	NPCC	10																																																					
13. Bruce Metruck	New York Power Authority	NPCC	6																																																					
14. Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5																																																					
15. Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10																																																					
16. Robert Pellegrini	The United Illuminating Company	NPCC	1																																																					
17. David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5																																																					
18. Brian Robinson	Utility Services	NPCC	8																																																					
19. Brian Shanahan	National Grid	NPCC	1																																																					
20. Wayne Sipperly	New York Power Authority	NPCC	5																																																					
21. Donald Weaver	New Brunswick System Operator	NPCC	2																																																					
22. Ben Wu	Orange and Rockland Utilities	NPCC	1																																																					
23. Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3																																																					
24. Helen Lainis	Independent Electricity System Operator	NPCC	2																																																					
25. Si-Truc Phan	Hydro-Quebec TransEnergie	NPCC	1																																																					
26. Randy MacDonald	New Brunswick Power Transmission	NPCC	9																																																					
2.	Group	Janet Smith	Arizona Public Service Company	X		X		X	X																																															
No additional responses provided.																																																								
3.	Group	Colby Bellville	Duke Energy	X		X		X	X																																															
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6.	Group	Randi Heise	NERC Compliance Policy	X		X		X	X																																								
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7.	Group	Pamela Hunter	Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	X		X		X	X																																								
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8.	Group	Kelly Cumiskey	PacifiCorp	X		X		X	X																																								
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9.	Group	Erika Doot	Bureau of Reclamation	X				X																																									
No additional responses provided.																																																	
10.	Individual	Tammy Porter	Oncor	X		X																																											
11.	Individual	John Seelke	Public Service Enterprise Group	X		X		X	X																																								
12.	Individual	Nazra Gladu	Manitoba Hydro	X		X		X	X																																								

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13.	Individual	David Thorne	Pepco Holdings Inc	X		X								
14.	Individual	Barbara Kedrowski	Wisconsin Electric Power			X	X	X						
15.	Individual	Thomas Foltz	American Electric Power	X		X		X	X					
16.	Individual	Michael Falvo	Independent Electricity System Operator		X									
17.	Individual	Julaine Dyke	Northern Indiana Public Service Company	X		X		X	X					
18.	Individual	Andrew Gallo	City of Austin dba Austin Energy	X		X	X	X	X					
19.	Individual	Andrew Z. Puztai	American Transmission Company, LLC	X	X									
20.	Individual	Cheryl Moseley	Electric Reliability Council of Texas, Inc.											
21.	Individual	Alice Ireland	Xcel Energy	X		X		X	X					

If you support the comments submitted by another entity and would like to indicate you agree with their comments, please select "agree" below and enter the entity's name in the comment section (please provide the name of the organization, trade association, group, or committee, rather than the name of the individual submitter).

Summary Consideration: N/A

Organization	Agree	Supporting Comments of "Entity Name"
N/A	N/A	N/A

1. As explained in more detail in the Five-Year Review Recommendation to Affirm FAC-003-3, the FYRT believes that FAC-003-3 includes technically justified, clear requirements and recommends affirming it. Do you agree that FAC-003-3 should be affirmed? If not, please explain. (Note that if FERC does not approve FAC-003-3, this recommendation will apply to FAC-003-2.)

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 1 Comment
ACES Standards Collaborators	No	FAC-003-3 should not be affirmed because it is still pending FERC approval. We also disagree that FAC-003-2 should be affirmed in the event that FERC does not approve FAC-003-3. Based on the review team’s logic of delaying FAC-010, -011, and -014 until FERC acts on the pending standards, why wouldn’t the same reasoning apply to FAC-003-3? FAC-003-3 should not be affirmed; rather the review should be delayed until the Commission has issued a final order.
Wisconsin Electric Power	No	We appreciate the work of the FYRT in their review of these standards. However, we believe FAC-003-3 has a flaw which should be corrected at this opportunity. The requirement for a “clear line of sight” unnecessarily requires Generator Owners having very short generator interconnection leads to meet the

Organization	Yes or No	Question 1 Comment
		<p>vegetation management requirements designed for transmission circuits that have far greater exposure and risk. The applicability based on length of the circuit alone (greater than one mile) is entirely sufficient to assure that the BES is not at risk due to vegetation issues on generator interconnection leads. We wish to note that this also was the conclusion of the original GO-TO Task Force. The reliability risk of vegetation problems on overhead lines at the Generator-Transmission interface is almost zero. The requirement for Generator Owners to develop vegetation management programs for these short lines is counterproductive to reliability in that it will expend scarce resources for compliance that are better used for actual reliability improvements. Therefore, we urge the FYRT to recommend revisions to FAC-003-3 that will better utilize industry resources while still limiting risk of vegetation related outages.</p>
SPP Standards Review Group	Yes	<p>Even though it has been somewhat confusing in reading through the posted package and having to swap back and forth from one version of the standard to another.</p>

Organization	Yes or No	Question 1 Comment
Northeast Power Coordinating Council	Yes	This is a recently approved standard and is being included in the five year review so as to make the review by standards family complete. Affirmation is the appropriate approach.
Arizona Public Service Company	Yes	
Duke Energy	Yes	
NERC Compliance Policy	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
Bureau of Reclamation	Yes	
Oncor	Yes	
Public Service Enterprise Group	Yes	
Pepco Holdings Inc	Yes	
American Electric Power	Yes	

Organization	Yes or No	Question 1 Comment
Independent Electricity System Operator	Yes	
Northern Indiana Public Service Company	Yes	
City of Austin dba Austin Energy	Yes	
American Transmission Company, LLC	Yes	
Xcel Energy	Yes	

2. As explained in more detail in the Five-Year Review Recommendation to Affirm FAC-008-3, the FYRT believes that FAC-008-3 includes technically justified, clear requirements and recommends affirming it, with some clarifying modifications to the FAC-008-3 Reliability Standard Audit Worksheet. Do you agree that FAC-008-3 should be affirmed? If not, please explain.

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 2 Comment
Northeast Power Coordinating Council	No	<p>The Facility Rating required by FAC-008 is purely a NERC compliance activity in many regions. The specificity in which the requirements are written precludes entities from using the actual ratings provided to their RC/PC/TP/TO/TOP as evidence in support of the requirements. For example, ISO-NE uses the NX-9 and NX-12 documents to gather the data necessary, while ERCOT used the RARF process. Neither of the processes provides the rating in a format that would be fully compliant with FAC-008-3. It is an unnecessary burden for entities to maintain multiple facility ratings. Additionally, auditors are aware of this discrepancy and generally request both ratings. The standard should be revised to either:</p> <ul style="list-style-type: none"> o require all RC's to only request Facility Ratings which are developed in

Organization	Yes or No	Question 2 Comment
		<p>accordance with FAC-008 or o allow any Facility Rating that complies with an RC Facility Rating request be an acceptable method for compliance with FAC-008. Because of the prescriptive nature of FAC-008, a separate rating methodology and rating must be developed for compliance. Developing two separate ratings using two separate methodologies does not support the reliability of the BES. One rating for a facility, along with the appropriate documentation, should be sufficient.</p>
ACES Standards Collaborators	No	<p>We recommend that FAC-008-3 be revised instead of affirmed. There are several modifications that could improve the standard. For instance, we suggest retiring R8 and rewriting R7 to read "Each TO and GO..." Also, there are several requirements (R1 part 1.1, part 1.2, and R2 sub-parts) that are more appropriate a technical guideline rather than a standard. FAC-008-3 has several requirements and sub-parts that could be clarified, retired under Paragraph 81, or moved to a technical guideline. The standard should be revised to address these issues.</p>
NERC Compliance Policy	No	<p>Dominion questions why team recommended removing many of the sub-</p>

Organization	Yes or No	Question 2 Comment
		<p>requirements in FAC-001 as too prescriptive, yet left many of them in FAC-008-3 (such as 2.2.1-2.2-4 and 3.2.1-3.2.4). Dominion also suggests that R8 in its entirety, be removed as it is administrative in nature. Dominion recommends including the undefined term “terminal equipment” in R2.4.1 and R3.4.1 as a new definition in the Standard only, the NERC Glossary of Terms Used in Reliability Standards rather than including a definition in the FAC-008-3 RSAW. For reasons cited above, Dominion recommends REVISING this standard rather than RE-AFFIRMING. Dominion was unable to locate the clarification of the undefined term in RSAW_FAC-008-3_2013_v2. In addition, Dominion notes that the FAC-008-3 RSAW Version notation is identified as RSAW Version: RSAW_EOP-005-2_2013_v1 on the FAC-008-3 - Facility Ratings RSAW document cover page. Dominion suggests that NERC reviews CAN-0009 for its accuracy, as FAC-009-1 was inactive on 12/31/2012.</p>
Northern Indiana Public Service Company	No	<p>NIPSCO does not agree that clarification can be offered through a revised FAC-008-3 RSAW without also modifying the standard itself. The RSAW points back to and addresses each sub-requirement in</p>

Organization	Yes or No	Question 2 Comment
		<p>the standard line by line. If an issue is not corrected in the standard, how is it possible for an RSAW to address ambiguities? There are inconsistencies between R2.1 and R2.2 and also between R3.1 and R3.2. R2.1 and R3.1 both state (“...at least one of the following...”) and R2.2 and R3.2 both state (“...how each of the following were...”). NIPSCO suggests combining R2.1 and R2.2 and also R3.1 and R3.2 into one requirement, retaining the statement (“...at least one of the following...”), and eliminating the statement (“...how each of the following were...”). In doing this, R2.2.1, R2.2.2, R3.2.1 and R3.2.2 should be deleted and removed from the standard since they are already addressed in R2.1 and R3.1. This concept may be redundant (Criterion B7) per paragraph 81. Further clarification is requested on the requirements R1.1 versus R2.1/R3.1. Why is there an ambiguous difference in this verbiage? In R1.1, the first bullet point is a paraphrase of the first and second bullet points of R2.1/R3.1. R1.1 bullet point two seems to be a wordier restatement of R2.1/R3.1 bullet point three. What is intended by not stating these requirements with identical wording?</p>

Organization	Yes or No	Question 2 Comment
Xcel Energy	No	We believe FAC-008-3 should be modified to address and clarify the applicability of requirements to dispersed generation. In its deliberations, the drafting team should consider the development of threshold criteria, as it would pertain to a dispersed generation facility.
Arizona Public Service Company	Yes	
Duke Energy	Yes	
SPP Standards Review Group	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
Oncor	Yes	
Public Service Enterprise Group	Yes	
Manitoba Hydro	Yes	
Pepco Holdings Inc	Yes	

Organization	Yes or No	Question 2 Comment
Wisconsin Electric Power	Yes	
American Electric Power	Yes	
Independent Electricity System Operator	Yes	
City of Austin dba Austin Energy	Yes	
American Transmission Company, LLC	Yes	
Bureau of Reclamation		Reclamation believes that the ambiguous language related to 'terminal equipment' and facility ratings addressed in CANs should be corrected in the standard rather than in RSAWs.

3. As explained in more detail in the Five-Year Review Recommendation to Affirm FAC-013-2, the FYRT believes that FAC-013-2 includes technically justified, clear requirements and recommends affirming it. Do you agree that FAC-013-2 should be affirmed? If not, please explain.

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 3 Comment
ACES Standards Collaborators	No	FAC-013-2 could be combined with MOD-001 (TOP and TSP in operations horizon). If MOD -001, -028, -029 and -030 are retired, there may be a gap for the near term operating horizon and revising FAC-013-3 could address the gap for the near term planning horizon and the operational planning horizon. Also, there is a need to review the standard's use of "transfer capability" and "total transfer capability," as these seem to be redundant or difference is not clear. Finally, Requirements R1 parts 1.2 and 1.3, R2, R5, and R6 meet the Paragraph 81 criteria for retirement. Based on these reasons, we believe that FAC-013-2 should be revised and not affirmed.
Electric Reliability Council of Texas, Inc.	No	ERCOT is the Planning Coordinator for the ERCOT Region, which is the sole functional entity impacted by FAC-013. ERCOT is

Organization	Yes or No	Question 3 Comment
		<p>established as the ERCOT ISO pursuant to the Texas Public Utility Regulatory Act. Additionally, FAC-013-2 is related to the Modeling, Data, and Analysis (“MOD”) Reliability Standards approved in FERC Order 729. In that Order, the Commission exempted ERCOT from the MOD standards because of the unique regional differences related to the ERCOT transmission system. The basis for the exemption in Order 729 applies to FAC-013-2 as well. Subjecting ERCOT to FAC-013 merely creates compliance obligations (and corresponding risk) with no reliability benefit. Order 729 exempted ERCOT from the MOD standards approved therein because the concepts did not apply in the ERCOT Region due to regional differences. FAC-013-2 applies those same concepts to the planning horizon. The ERCOT region does not have a transmission market and ERCOT manages congestion by employing a security constrained economic dispatch. ERCOT has no interchange with neighboring regions. The lack of a transmission market and congestion management via re-dispatch means that all available transmission capacity on the ERCOT grid is fully utilized, subject only to relevant reliability limits. Quantitative calculations related to transmission transfer capability</p>

Organization	Yes or No	Question 3 Comment
		<p>in the ERCOT Region provides no value from a reliability or market perspective. Therefore, similar to the MOD standards, FAC-013 should not apply to ERCOT. FAC-013 should be revised to include an exemption in Section E. Regional Variances that exempts ERCOT. In the past, ERCOT's position has been supported by the NERC Regional Entity for the ERCOT Region, the Texas Reliability Entity ("Texas RE").</p>
Northeast Power Coordinating Council	Yes	
Arizona Public Service Company	Yes	
Duke Energy	Yes	
SPP Standards Review Group	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing	Yes	
PacifiCorp	Yes	
Bureau of Reclamation	Yes	

Organization	Yes or No	Question 3 Comment
Public Service Enterprise Group	Yes	
Manitoba Hydro	Yes	
American Electric Power	Yes	
Independent Electricity System Operator	Yes	
Northern Indiana Public Service Company	Yes	
City of Austin dba Austin Energy	Yes	
American Transmission Company, LLC	Yes	

4. As explained in more detail in the Five-Year Review Recommendation to Delay Review of FAC-010-2.1, FAC-011-2, and FAC-014-2, the FYRT believes that all three standards require revision to add clarity and remove redundancy with the newly revised TOP and TPL standards, but that a thorough review of these standards should be delayed until FERC acts on TOP-001-2, TOP-002-3, TOP-003-2, and TPL-001-4. Do you agree that review of FAC-010-2.1, FAC-011-2, and FAC-014-2 should be delayed? If not, please explain.

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Yes or No	Question 4 Comment
Duke Energy	No	Duke Energy recommends an initial review of FAC-010-2.1, FAC-011-2, and FAC-014, by the FAC FRYT, to determine if a potential reliability gap would be created by delaying the review of these standards. In particular Duke Energy would like assurance that outage plans are assessed for their impact on reliability sufficiently ahead of time and when plans are modified. The TOP SDT team identified FAC-011 and FAC-014 as providing these type of assessments. When transmission and generation outage plans are made, assessments must be conducted to ensure reliability of the BES. These assessments should be conducted seasonally up to day ahead. It is no longer clear that the IRO, FAC and TOP standards act together to ensure proper assessments are performed.

Organization	Yes or No	Question 4 Comment
		The Independent Experts Review Project identified Outage Coordination as a key area of concern where risk to BPS reliability was not adequately mitigated by the Reliability Standards.
NERC Compliance Policy	No	Dominion does not agree with recommendation to delay review of FAC-010-2.1, FAC-011-2, and FAC-014-2 until FERC acts on TOP-001-2-Transmission Operations, TOP-002-3-Operations Planning, and TOP-003-2-Operational Reliability Data. These purpose of these FAC standards is to insure that limits (including SOL and IROL) are established whereas the purpose of the cited TOP and TPL standards is to insure information is provided and plans in place to adhere to limits (including SOL and IROL).
Electric Reliability Council of Texas, Inc.	No	1. FAC-010-2.1 R2 is redundant with the TPL standards and should be removed. R2 and its sub-requirements have contingency performance requirements that are the same as Table 1 of the TPL standards.2. The use of the term “Remedial Action Plans” in FAC-010-2.1 R3.4 is incorrect and should be removed. This is not a defined term. It may be referring to “Remedial Action Scheme” which is a defined term but is redundant with the term “Special

Organization	Yes or No	Question 4 Comment
		Protection System” that is already used in R3.4.3. FAC-014-2 R6 should be rewritten to consider the new TPL-001-4 standard and the multitude of contingencies that could result in a stability limit. Since TPL-003 will be retired upon implementation of TPL-001-4 the reference will be obsolete. Additionally, a revision should take into consideration that multiple types of P contingencies in the new Table 1 or even an extreme event may cause the creation of an SOL due to a stability limit - not just a Category C contingency as contemplated in the current standard.
ACES Standards Collaborators	Yes	It is proper to delay the review of standards that are pending FERC approval. We have included overlap issues that are associated with these standards when they are ripe for review.
Northeast Power Coordinating Council	Yes	
Arizona Public Service Company	Yes	
SPP Standards Review Group	Yes	
Southern Company: Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation;	Yes	

Organization	Yes or No	Question 4 Comment
Southern Company Generation and Energy Marketing		
PacifiCorp	Yes	
Bureau of Reclamation	Yes	
Oncor	Yes	
Public Service Enterprise Group	Yes	
Manitoba Hydro	Yes	
Pepco Holdings Inc	Yes	
American Electric Power	Yes	
Independent Electricity System Operator	Yes	
Northern Indiana Public Service Company	Yes	
City of Austin dba Austin Energy	Yes	
American Transmission Company, LLC	Yes	

5. If you have any other comments on the FAC Five-Year Review Recommendations that you have not already mentioned above, please provide them here.

Summary Consideration: The FYRT thanks all commenters for their input and refers them to the responses above.

Organization	Question 5 Comment
Northeast Power Coordinating Council	The PDF of the standard refers to M7 and M8 on the bottom of page 5. There is an R7 and R8, but no corresponding M7 and M8. M5 and M6 reference R7 and R8. The Generator Owner shall keep evidence for Measure M7 for three calendar years... The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
ACES Standards Collaborators	There are other standards besides the TOP and TPL standards that overlap with FAC-011 and FAC-014. The standards project that is developing the VAR standards also overlaps with the FAC requirements. In particular, the proposed VAR-001-4 R1 is redundant with FAC-011-2 and FAC-014-2 and, thus, meets paragraph 81 criteria. FAC-014-2 R2 requires each TOP to establish SOLs for its transmission system that is consistent with the RC SOL methodology. FAC-011-2 R2 compels the RC to develop a SOL methodology that requires SOLs to consider voltage, thermal, and stability limits (including voltage) and demonstrate that the BES remains stable (transient, dynamic and voltage) during pre-contingent (R2.1) and post-contingent (R2.2)

Organization	Question 5 Comment
	<p>conditions. FAC-014-2 R6 compels the Planning Coordinator to identify which Category C (multiple) contingencies from TPL-003 that result in stability limits (including voltage) and to communicate the list of Category C (multiple) contingencies along with the stability limits to the RC. FAC-011-2 further compels the RC to establish a process for identifying which stability limits associated with multiple contingencies identified by the Planning Coordinator are applicable in the operating horizon within its SOL methodology. FAC-014-2 R5.2 compels the TOP to communicate its SOLs to its RC and TSP and FAC-014-2 R5.1 compels the RC to communicate the SOLs to neighboring RCs and other TOPs among a list of other entities. Finally, existing TOP-002-2.1b R10 and proposed TOP-002-3 R2 both require the TOP to operate within SOLs. Thus, the combination of FAC-011-2 and FAC-014-2 compel the establishment and communication of SOLs within the TOP footprint that already consider the items such as steady-state voltage limits and voltage stability limits compelled in proposed VAR-001-4 R1 and its subparts and TOP-002 compels the TOP to operate within those SOLs. These overlaps need to be reviewed and justify a recommendation for revising the FAC-011 and FAC-014.</p>
Manitoba Hydro	<p>(1) General Comment - replace “Board of Trustees” with “Board of Trustees” throughout the applicable documents/standards for consistency with other standards.</p>

END OF REPORT