

Comment Form for 3rd Posting of Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard

**COMMENT FORM
Proposed Determine Facility Ratings**

This form is to be used to submit comments on the proposed Determine Facility Ratings Standard. Comments must be submitted by **April 03, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "DFR Standard- Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

- DO:**
- Do enter text only, with no formatting or styles added.
 - Do use punctuation and capitalization as needed (except quotations).
 - Do use more than one form if responses do not fit in the spaces provided.
 - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
 - Do not use numbering or bullets in any data field.
 - Do not use quotation marks in any data field.
 - Do not submit a response in an unprotected copy of this form.

Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Alan Adamson	
Organization:	New York State Reliability Council (NYSRC)	
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Email:	aadamson@nycap.rr.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	

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Background Information:

The Determine Facility Ratings, System Operating Limits and Transfer Capabilities Standard was last posted for a public comment period from December 1, 2003 through January 21, 2004. The SDT received 43 sets of comments, representing 170 different individuals from 89 entities in six of the nine Industry Segments, and all NERC Regions.

While commenters indicated the standard is moving towards industry consensus, they also highlighted a number of areas needing additional clarification. The Standards Authorization Committee (SAC) also asked the Standard Drafting Team to bring certain concerns about a single rating methodology, as stated in August 14, 2003 Blackout documents, to the industry for feedback and possible inclusion into this standard. In addition, the NERC Operating Committee asked that the members of the Operating Limits Definition Task Force (OLD-TF), the Operate Within IROLs SDT (IROL SDT), and the members of the Determine Facility Ratings SDT (DFR SDT) to develop a common draft IROL definition for industry comment.

The SDT did make three types of changes to this draft standard – changes based on industry comments to the second posting of this standard, changes based on the request from the SAC, and changes based on the necessity to have a common understanding of how to identify IROLs. The changes to the standards relative to the last posting are highlighted in the Executive Summary of Changes Made, and the attached form seeks your feedback on the appropriateness of these changes. In addition to the changes highlighted in the Executive Summary, the SDT put the standard into the ‘new’ standard format established with Version 0 Standards. With the new format, each of the six major requirements is now a ‘stand-alone’ standard, sequentially numbered FAC-008-1 through FAC-013-1.

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Please answer the following questions:

Definitions:

1. Do you agree with the SDT's proposed definitions for Cascading Outages, Contingencies, Interconnection Reliability Operating Limits, and Interconnection Reliability Operating Limit T_v ?

Agree

Disagree

Comments: The STD's definitions for Cascading Outages and Contingencies are inconsistent with the definitions for those terms included in the Version 0 Glossary of Terms (Draft 4 - 1/7/05). We prefer the Version 0 definitions.

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FAC-008-1 (Previously Section 601) – Facility Ratings Methodology:

2. What additional changes, if any, should the SDT make to Reliability Standard FAC-008-1 to add more criteria to the requirement for establishing a Facility Ratings Methodology?

No additional changes needed

The following additional criteria are needed:

Comments: In R2 the following phrase should be added: "in accordance with the individual's confidentiality agreements." This addition is necessary because of the Intellectual Property issues that may exist.

3. Do you agree with the changes made to Reliability Standard FAC-008-1 to address the technical review of Facility Ratings Methodologies?

Agree

Disagree

Comments: We do not agree with the statement that allows "technical review". The Methodology should only be required to be made available as stated, when appropriate confidentiality agreements are in place.

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FAC-010-1 (Previously Section 603) – System Operating Limits Ratings Methodology:

4. Do you agree with moving the identification of IROLs to this standard?

Agree

Disagree

Comments:

5. What additional changes, if any, should the SDT make to Reliability Standard FAC-010-1 to add more criteria to the requirement for establishing a System Operating Limits Methodology to determine SOLs; and/or to determine which SOLs are also IROLs?

No additional changes needed

The following additional criteria are needed:

Comments:

6. Do you agree with the changes made to Reliability Standard FAC-010-1 to address the technical review of System Operating Limits Methodologies?

Agree

Disagree

Comments:

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FAC-012-1 (Previously Section 605) – Transfer Capability Methodology:

7. What additional changes, if any, should the SDT make to Reliability Standard FAC-012-1 to add more criteria to the requirement for establishing a Transfer Capability Methodology?

No additional criteria needed

The following additional criteria are needed:

Comments:

8. Do you agree with the changes made to Reliability Standard FAC-012-1 to address the technical review of the Transfer Capability Methodology?

Agree

Disagree

Comments:

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Overall Standard:

9. Please identify any other changes you think the SDT should make to this standard before it is submitted for ballot.

The technical content of the standard is ready to be submitted for ballot

The following changes should be made to the standard before it is submitted for ballot:

Other comments: Requirement R4 of Standard FAC-010-1 should be expanded to include the requirement that SOLs shall provide BES performance that recognize events resulting in the loss of two or more (multiple) elements. Assessment of these contingencies (referred to as Category C Contingencies in Version 0 Standards TPL-001-0 to TPL-004-0) is presently required under Standard TPL-003-0. Therefore, not considering Category C Contingencies in Standard FAC-010-1 would constitute a WEAKENING of present NERC Standards. Continued omission of this requirement in this proposed Standard would likely be a "show stopper" for the New York State Reliability Council (NYSRC) when the Standard is balloted. Furthermore:

-- To state in this Standard that Regions may require assessment of more stringent standards (see FAC-010-1 R4, pages 3 and 4), e.g., Category C Contingencies, does not relieve the above NYSRC concerns. To the contrary, NPCC and New York reliability could be impacted if neighboring Regions operate to weaker NERC criteria.

-- It is curious as to why the SDT - if it agrees with the NERC principle that Regions may have more stringent criteria than NERC criteria – singles out just one section of this Standard (R4 of FAC-010-1) in which to apply this principle (see above item), without stating the principle is applicable to the entire group of FAC Standards.

-- The U.S. - Canada Power System Outage TF Report's Recommendation #25 states: "A strong transmission system designed and operated in accordance with weakened criteria would be disastrous. Instead, a concerted effort should be undertaken to determine if existing reliability criteria should be strengthened...Only through strong standards and careful engineering can unacceptable power failures like August 14, 2003 be avoided in the future." We do not believe that draft Standard FAC-010-1, because it weakens present NERC criteria, complies with this Recommendation. In accordance with Recommendation #25, consideration should be given to strengthening the Standard, not weakening it.

In conclusion, the NYSRC believes that weakening of present NERC criteria, in light of 2003 Blackout lessons learned, would be unacceptable - not only for NY reliability - but for the reliability of the entire North American bulk power system. WE STRONGLY URGE the STD to reinstate Category C requirements in this Standard, and that TPL-003-0 requirements not be replaced by this new Standard.

Other comments:

1. R4 of Standard FAC-010-1 should reference Table 1 of the TPL Standards.

2. In R4.1.1 of this Standard the parenthetical should be changed to: (or group of facilities and/or their associated equipment such as stabilizers and AVRs).

3. R2 has no associated measure.

4. There is no documentation with the proposed Standards that indicates whether these Standards replace or revise existing Version 0 Standards, such as the removal of Category C Contingency requirements as pointed out above. We, therefore, suggest that an Implementation Plan with this information be included in the next version.

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