COMMENT FORM FOR
DETERMINE FACILITY RATINGS DRAFTING TEAM'S PROPOSED IMPLEMENTATION PLAN AND RECOMMENDATIONS FOR CHANGES TO ASSOCIATED VERSION 0 STANDARDS

Please use this form to submit comments on the Determine Facility Ratings Drafting Team's proposed Implementation Plan and recommendations for retirement or revision to Version 0 Standards FAC-004-0, FAC-005-0 and TOP-004-0. Comments must be submitted by **July 15, 2005.** You must submit the completed form by emailing it to sarcomm@nerc.com with the words "Implementation Plan DFR Standard Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or 609.452.8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE.

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:	**Peter Henderson**	
Organization:	**Independent Electricity System Operator, Ontario**	
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NERC Region		**Registered Ballot Body Segment**
☐ ERCOT ☐ ECAR ☐ FRCC ☐ MAAC ☐ MAIN ☐ MAPP ☒ NPCC ☐ SERC ☐ SPP ☐ WECC ☐ NA - Not Applicable	☐	1 - Transmission Owners
	☒	2 - RTOs, ISOs, Regional Reliability Councils
	☐	3 - Load-serving Entities
	☐	4 - Transmission-dependent Utilities
	☐	5 - Electric Generators
	☐	6 - Electricity Brokers, Aggregators, and Marketers
	☐	7 - Large Electricity End Users
	☐	8 - Small Electricity End Users
	☐	9 - Federal, State, Provincial Regulatory or other Government Entities

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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact Email:

Additional Member Name	Additional Member Organization	Region*	Segment*

* If more than one Region or Segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Background:

The Determine Facility Ratings Standard Drafting Team has considered the comments submitted with the last posting of this set of standards and has posted the following documents for stakeholder review:

- Consideration of the Comments submitted on the 3rd Draft of the Determine Facility Ratings Standards
- Clean version of the 4th draft of the Determine Facility Ratings Standards
- Red Line version of the 4th draft of the Determine Facility Ratings Standards
- Implementation Plan
- Version 0 Standards recommended for retirement or revision

The Drafting Team feels that there is consensus on the content of these standards and wants to move the standards forward for balloting. As an interim step, the Standards Authorization Committee asked the Drafting Team to solicit feedback on its recommendations for retirement or revision of Version 0 standards and on the Implementation Plan. The Drafting Team is recommending the following changes to Version 0 Standards:

FAC-004-0 Methodologies for Determining Electrical Facility Ratings

- Retire the entire standard coincident with the implementation of FAC-008-1.

FAC-005-0 Electrical Facility Ratings for System Modeling

- Retire the entire standard coincident with the implementation of FAC-009-1.

TOP-004-0 Transmission Security

- Retire the following requirements coincident with the implementation of FAC-011-1:
  - R6.1
  - R6.5

The Determine Facility Ratings Standard Drafting Team's Implementation Plan includes 4 months for entities to achieve full compliance with the proposed requirements. Thus, if the Board of Trustees adopts the standards on November 1, the standards would become effective on January 1, 2006 and entities would have until March 1, 2006 to achieve full compliance.

The Drafting Team's reasoning for the above recommendations are included in the Implementation Plan for this set of standards. Please read the Implementation Plan and respond to the questions to let the Drafting Team know if you support its recommendations.

Determine Facility Rating Standard Implementation Plan and Recommendations for Retirement/Revision of Associated Version 0 Standards – Comment Form

Please Enter All Comments in Simple Text Format.

Questions:

Insert a "check' mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with deleting Reliability Standard FAC-004-0 coincident with the implementation of Reliability Standard FAC-008-1? If no, please comment.

   ☐ Yes

   ☒ No

   Comments:

Element is a defined term in currently approved standards, while Facilities is defined in the proposed DFR standard. Element and facility are both used in the currently approved standards, and in some cases seemingly interchangeably. This creates ambiguity. New standards / revisions should be removing ambiguity not increasing it. This may mean opening up the currently approved standards for revision. The consequence is that the process may get bogged down

As an example the approved standards re:

IRO-002-0 Reliability Coordination – Facilities (R6)

IRO-005 Reliability Coordination — Current Day Operations (R1)and

IRO-003-0 Reliability Coordination – Wide-Area View (R1)

mention the terminologies such as element and facilities.

Looking at the definitions, it is confusing what is an element and what is a facility since Facility uses the term element yet they refer to similar equipment (ie transformer or line).

DFR standard - Facility: A set of electrical equipment that operates as a single Bulk Electric System Element (e.g., a line, a generating plant, a shunt compensator, transformer, etc.)

Approved Version 0 Glossary - Element: Any electrical device with terminals that may be connected to other electrical devices such as a generator, transformer, circuit breaker, bus section, or transmission line. An element may be comprised of one or more components.

Is it proposed by DFR to delete Element? This action is not identified in the Implementation plan. We believe that these discrepancies may be a concern when DFR series of Standards comes to ballot as it raises the question on whether the currently approved standards require updating to reflect proper usage of Facility. Implementation plans must look at the whole scope of any change not just at what will be retired.

2. Do you agree with deleting Reliability Standard FAC-005-0 coincident with the implementation of Reliability Standard FAC-009-1? If no, please comment.

   ☒ Yes

☐ No

Comments

3. Do you agree with retiring TOP-004-0_R6.1 and TOP-004-0_R6.5 coincident with the implementation of FAC-011-1? If no, please comment.

☒ Yes

☐ No

Comments:

4. Are you aware of any other Version 0 Requirements that should be retired or revised coincident with the set of Determine Facility Ratings Standards?

☒ Yes

☐ No

Comments:

FAC-010-1 R4.2 states "Following the single Contingencies identified in Reliability Standard FAC-010- 1_R4.2.1 through R4.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their thermal, voltage and stability limits; and Cascading Outages or uncontrolled separation shall not occur."

In FAC-010-1 R4.2.2. the requirements state that the "Loss of any generator, line, transformer, or shunt device without a Fault." must be observed for 4.2.

This seems to exclude the loss of any single bus or an inadvertent breaker opening. Either of these are single contingencies that can remove additional BES equipment or reconfigure the BES to the point where the BES could be in a cascading situation. As such these losses must be observed. Was this exclusion deliberate or just overlooked?

This is not consistent with TPL series of standards that state the "B" contingencies must be observed. The table highlights those requirements stated in FAC-010-1 R4.2.2 and 4.2.3, but goes on the state "Loss of an Element without a Fault".

DFR Standards infers that the system should be operated to N-2.

Specifically FAC-010-1 R4.2 which states: "Following the single Contingencies identified in Reliability Standard FAC-010-1_R4.2.1 through R4.2.3, the system shall demonstrate transient, dynamic and voltage stability; all Facilities shall be operating within their Facility Ratings and within their thermal, voltage and stability limits; and cascading outages or uncontrolled separation shall not occur."

While we agree with everything up to "within their thermal," and after "and cascading", we have a concern that all facilities must be operated such that following a contingency they must still be respecting Voltage and Stability limits. The way it is written it infers that this must be respected as part

of the outcome of the contingency (ie immediately after the contingency), we are really saying that we must be operating to N-2 Pre-contingency.

In theory, current standards require action ASAP to get within voltage and stability limits, but allow "30 minutes" to be at this requirement following a contingency from a compliance perspective.

The draft Standard FAC-010-1 does not include "the imposition of multiple element Category C" contingencies which are in the current TPL-002-0 standards. This should be included.

5. Do you agree that four months beyond the date of the Board of Trustees' adoption is sufficient time for entities to meet the requirements in this set of standards? If no, please identify any requirement that you feel will require more than 4 months of preparation time. Please include an explanation of why you feel it will need more preparation time and how much time you believe is needed.

   ☐ Yes

   ☒ No

   Comments:

   While we do not have problems with the 4 months period , we do not support the implementation plan until standards referred to in Q1 and Q4 are revised to address the comments.