

**Comment Form – 1st Posting of the draft ‘Determine Facility Ratings, System Operating Limits, and Transfer Capabilities’ Standard**

*Note – This form is to be used to comment on version 1 of the Determine Facility Ratings, System Operating Limits, and Transfer Capabilities Standard.*

*Comments will be accepted from July 1 – August 29, 2003.*

**Please review the draft standard and answer the questions in the yellow boxes. Send completed comment forms to [sarcomm@nerc.com](mailto:sarcomm@nerc.com)**

*If you have questions, please call Tim Gallagher at 609-452-8060 or send a question to [timg@nerc.com](mailto:timg@nerc.com)*

**SAR Commenter Information (For Individual Commenters)**

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|--------------------|--|
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**Key to Industry Segment #'s:**

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial  
Regulatory or other Govt. Entities



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each of these pairs, the draft standard requires the development and availability of a “methodology” to determine the required quantities and secondly the application of this methodology in the establishment and communication of these values to the users of the values. These standards were developed assuming that the Facility Ratings, System Operating Limits and Transfer Capability values are to be provided to the user (e.g. those entities performing the reliability authority, planning authority, and transmission operator functions) on a schedule established by the *user*. The SDT endeavored to ensure that this draft standard would not require the determination of various values that had no identified user. For this reason, the user of the various values must request the specific values from the value provider (e.g. those entities performing the facility owner and planning authority functions) through the establishment of a schedule to supply the data.

### **Levels of Noncompliance:**

In the three ‘methodologies’ sections (601, 603, 605), the levels of noncompliance are based upon the availability and completeness of the documented procedures. In the three ‘communication’ sections (602, 603, 605), the levels of noncompliance are based on the availability of the values requested by the users of the information and the consistency of these values with the documented methodologies.

### **Sanctions:**

The SDT believes that failure to comply with the three ‘methodologies’ sections (601, 603, 605) does not warrant monetary sanctions, since the methodologies themselves would not directly impact the reliable operation of the transmission system.

The unavailability of Facility Rating *values*, System Operating Limit *values* and to a lesser extent, Transfer Capability *values* will have a real and detrimental impact on the real time reliability of the transmission system as well as the validity of transmission plans for future transmission system additions. Therefore, the three ‘communication’ sections (602, 604, 606) include monetary sanctions for repeated and/or significant noncompliance as per the sanction table. The SDT believes that nominal, fixed dollar sanctions are appropriate in these cases. The application of ‘per MW’ variable sanctions would be inappropriate for these infractions compared to the consequences of violating the requirements of the standard. While the SDT realizes that a minor omission of a requested value could result in sanction, the SDT also believes that graduated sanctions based upon the level of ‘completeness’ of the data received by the users are impractical. The SDT is of the opinion that not all values have equal importance to the reliability of the transmission system, and therefore, sanctions based upon ‘percentage of requested data received’ (perhaps omitting values of specific critical limitations) would be arbitrary.

### **Relationship with “Operate Within Limits” Standard:**

The SDT suggests that this draft standard be reviewed in concert with the “Operate Within Limits” draft standard. The Facility Ratings, System Operating Limits, and Transfer Capabilities draft standard requires the availability and usability of these data. The Operate Within Limits standard addresses the use of a subset of these values in real time operation. The SDT believes that the definitions developed in conjunction with this standard do not prohibit the stratification, or sub-classification, of the requested data (Facility Ratings, System Operating Limits, Transfer Capabilities) for specific uses or users. The intent and purpose of this standard, however, is to identify *all* system operating limits and not to differentiate them based upon the impacts of violating them.

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**1. This standard assumes that the reliability authority has the ultimate responsibility to establish system operating limits and relies upon the transmission operator for input. Have the roles and responsibilities of transmission operators versus reliability authorities in determining system operating limits been properly characterized in this standard?**

Yes

No

Comments

**2. Do you agree that identifying and communicating all system operating limits is within the scope of this standard and is necessary for reliability?**

Yes

No

Comments

**3. NERC Regions have the right to ask for Regional differences for inclusion in NERC standards. Such differences would apply only to the listed Region and would become an enforceable part of the NERC standard only if approved by the industry. NPCC has requested a Regional difference in section 603. Do you think NPCC’s Regional difference should be included in this standard?**

Yes

No

Comments The NPCC criteria is more stringent than the NERC standard.

**4. Are you aware of any other Regional differences that should be included in this standard?**

Yes

No

Comments Possibly ERCOT and WSCC will have differences.

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**5. Do you agree with the sanction philosophy in this standard? (No financial penalties for methodology violations, nominal fixed monetary penalties for failure to communicate values).**

Yes

No

Comments Financial penalties should not be applied. This would open the gate to financial penalties for the many, much more severe violations addressed in other standards. The IMO feels that non-monetary sanctions are sufficient.

**6. Do you agree with the proposed requirements and measurements in section 601?**

Yes

No

Comments

**7. Do you agree with the proposed compliance monitoring process in section 601?**

Yes

No

Comments

**8. Do you agree with the proposed levels of non-compliance in section 601?**

Yes

No

Comments See general comment below

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**9. Do you agree with the proposed requirements and measurements in section 602?**

Yes

No

Comments

**10. Do you agree with the proposed compliance monitoring process in section 602?**

Yes

No

Comments

**11. Do you agree with the proposed levels of non-compliance in section 602?**

Yes

No

Comments The levels do not seem to follow any progression which would suggest increasing severity. Why is failure to have all ratings for existing facilities any different than not having all ratings for new facilities: level 1 as opposed to level 2? Either you have ratings or not.

**12. Do you agree with the proposed requirements and measurements in section 603?**

Yes

No

Comments

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**13. Do you agree with the proposed compliance monitoring process in section 603?**

Yes

No

Comments

**14. Do you agree with the proposed levels of non-compliance in section 603?**

Yes

No

Comments See general comment below

**15. Do you agree with the proposed requirements and measurements in section 604?**

Yes

No

Comments

**16. Do you agree with the proposed compliance monitoring process in section 604?**

Yes

No

Comments

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**17. Do you agree with the proposed levels of non-compliance in section 604?**

Yes

No

Comments See general comment below

**18. Do you agree with the proposed requirements and measurements in section 605?**

Yes

No

Comments

**19. Do you agree with the proposed compliance monitoring process in section 605?**

Yes

No

Comments

**20. Do you agree with the proposed levels of non-compliance in section 605?**

Yes

No

Comments The level 2 and 3 violations seem more severe than the violation addressed in level 4.

**21. Do you agree with the proposed requirements and measurements in section 606?**

Yes

No

Comments

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**22. Do you agree with the proposed compliance monitoring process in section 606?**

Yes

No

Comments

**23. Do you agree with the proposed levels of non-compliance in section 606?**

Yes

No

Comments See general comment below

**24. What additional clarification, details, or modifications to this standard are necessary before it can be brought to ballot?**

Comments All the sanctions text should be removed, as they are dealt with elsewhere.

**25. Please enter any other comments you have regarding this standard in the space below.**

Comments

The proposed non-compliance levels for all these standards do not follow a natural progression. They seem to be somewhat contrived and slotted into the 4 levels.

601.4.2.2 - 10 years seems rather infrequent. Should provide opportunity for some verification when ratings change.

601.4.3, 602.4.4, 604.4.4, 606.4.4 - 3 years may not be long enough, given the typical timelines required to resolve differences.

603 Table I Note a) – reference is made to NERC Planning Standards – Will these still exist after the new family of standards are in place.

603 Table IA

– The NERC standard permits this table to be included here, but is it really necessary to have it here, other than for information purposes. At the NERC level, would it be sufficient to just note

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that NPCC has more stringent criteria and refer the reader to the NPCC standards.

- In the 2<sup>nd</sup> row, for “Cascading outages”, superscript “f” should be “c”. Under category C, for “Double Circuit Tower” (item #3) superscript “e” should be “f”
- Note “e” text requires reformatting to remove blank line.