

Comment Form for Project 2010-10 — Modifications to FAC-012 and FAC-013 for Order 729 — Draft FAC-013-2 Standard

Please **DO NOT** use this form. Please use the [electronic comment form](#) located at the link below to submit comments on the proposed SAR and modifications proposed FAC-013-2 — Planning Transfer Capability. Comments must be submitted by **January 8, 2011**. If you have questions please contact Darrel Richardson at Darrel.richardson@nerc.net or by telephone at 609-613-1848.

http://www.nerc.com/filez/standards/Project2010-10_FAC_Order_729.html

Background Information:

The SAR for Project 2010-10 – Modifications to FAC-012 and FAC-013 for Order 729 proposes modifications to the following standards:

- FAC-012-1 — Transfer Capability Methodology
- FAC-013-1 — Establish and Communicate Transfer Capabilities

In Order 729, FERC ruled that the ATC standards developed in Project 2006-07 did not completely address the topics covered in FAC-012 and -013 and did not fully address the associated directives from Order 693. Accordingly, FERC denied the portions of the implementation plan that would have retired these standards, and instead directed NERC to use the standards development process to make changes to the FAC standards and file those changes with FERC no later than 60 days prior to the effective date of the standards, which is currently believed to be on or after April 1, 2011 (requiring the proposed changes to be filed on or before January 28, 2011).

NERC has an obligation to address FERC's directives. It was the intent to identify all the applicable FERC directives and incorporate them in the draft standard. A second draft of the proposed standard has been developed that attempts to address the applicable FERC directives as-well-as address concerns raised by the industry during the first posting. Please review the proposed draft standard in its entirety and answer the following questions by using the electronic comment form.

You do not have to answer all questions. Enter all comments in Simple Text Format.

1. The SDT has defined the term Near-Term Transmission Planning Horizon. The definition reads “The transmission planning period that covers year’s one through five.” (This definition was originally developed by the Assess Transmission Future Needs SDT and has been moved to this project as this project will be completed before the Assess Transmission Future Needs project.) Do you agree that this term provides clarity as to the period the standard applies?

Yes

No

Comments:

2. The SDT has modified the Purpose statement. The Purpose statement now reads “To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of the ability to transfer energy (in the Near-Term Transmission Planning Horizon) to identify potential future weaknesses and limiting Facilities that could impact the reliability of the Bulk Electric System (BES).” Do you agree that the revised Purpose statement provides greater clarity as to what the standard is intended to accomplish?

Yes

No

Comments:

The existing Reliability Standards that apply for the Near-Term Planning Horizon (e.g. TPLs) require the identification of potential future weaknesses and limiting Facilities that could impact reliability of the BES for firm transfer commitments, not transfer capabilities beyond the firm transfer commitments.

The assessment of transfer capabilities beyond the firm transfer commitments in the Near-Term Planning Horizon would identify economic non-transfer opportunities that exist with the future planned transmission system and possible system expansion or improvements that could increase economic non-firm transfer opportunities.

Therefore, this purpose is appropriate for an open access, economic type of standard, not a transmission system Reliability Standard.

The purpose statement should assign the applicability of this standard to the Transmission Service Provider function and not the Planning Coordinator since this standard deals with identifying non-firm transfer capabilities. Therefore, the applicability should be changed from Planning Coordinator to Transmission Service Provider throughout this standard. Otherwise, perhaps the FAC-013-2 standard should be converted to an appropriate open access, economic (e.g. NAESB) standard.

3. The SDT has added a Requirement R6. The Requirement R6 reads “If a recipient of a documented Transfer Capability assessment requests data to support the assessment, the Planning Coordinator shall provide such data to that entity within 45 calendar days

of receipt of the request.” Do you agree that the Requirement is necessary for verification of the assessment?

Yes

No

Comments:

Requirement R6 does not serve a transmission system reliability purpose and should be removed.

The FAC-013-2 standard should be converted to an appropriate open access, economic (e.g. NAESB) standard.

4. The SDT has modified the VSLs to better align with the Requirements. Do you agree that the revised VSLs are now appropriately aligned with the Requirements?

Yes

No

Comments: Missing one of the parts 1.1, 1.2, 1.3 or 1.5 is a Moderate VSL while missing only part of 1.4 is a Lower VSL. This implies that missing one of the parts 1.1, 1.2, 1.3 or 1.5 is deemed to have missed a greater part of the requirement as a whole rather than missing part of 1.4. We disagree and, thus, recommend that the VSLs for missing one of 1.1, 1.2, 1.3 or 1.5 should start at a Lower VSL and increment to the next VSL for each successive missing part.

5. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standard.

Comments:

Requirement R1.2 should explicitly state that the assessment shall respect known Planning Horizon SOLs because the standard is applicable for the planning horizon and not the operating horizon. Otherwise, the lack of qualification could lead to interpretation issues with this Requirement.