

To whom this may concern,

The Midwest Reliability Organization NERC Standards Review Forum would like to submit the following comment.

CAN-0018; FAC-008; Requirement R1.2.1 – Terminal Equipment

The CAN issue to be address is, “What equipment is included under the term terminal equipment in the NERC Reliability Standard FAC-008?”

R1.2.1 states: “The scope of equipment addressed shall include, but not be limited to, generators, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices”.

The use of the wording “...but not limited to,...” within R1.2.1 gives the Transmission Owner and Generator Owner the opportunity to increase the scope of equipment that is addressed within their methodology to determine their Facility Rating(s).

The CAN inappropriately expands the scope of NERC compliance through the use of expansive wording such as “Any piece of series-connected equipment” and “any auxiliary”. It isn’t necessary nor feasible to provide an exhaustive list of all possible equipment combinations. The CAN needs to state the general method. The existing statement below needs to be struck from the CAN.

Any piece of series-connected equipment that comprises a Facility and that could have the most limiting applicable Equipment Rating

NERC should consider the following example wording to address the question of “what equipment is included under the term of terminal equipment”, and should then stop. Recommend the following to be the items that make up “terminal equipment”:

Terminal equipment is considered; wave traps, current transformers, disconnect switches, breakers and or primary fuses.

In addition all CANs should include the following headings to clearly establish CAN boundaries:

Where a CAN conflicts with an existing NERC standard or NERC standard implementation period, the NERC standard shall govern.

A CAN constitutes one possible example of compliance and shall not be used as the only way to meet compliance.

CANs apply to the NERC Bulk Electric System (BES) only and shall not extend guidance (or compliance) beyond the NERC BES.

CANs shall not enforce retroactive compliance or guidance.

CANs shall not use dates prior to the issuance date of a CAN.

CANs shall define an implementation plan and dates.