

Comment Form: Project 2010-07 Generator Requirements at the Transmission Interface

IMPORTANT NOTE: *Please make sure to hit the FINISH button at the bottom of this screen to submit your comments to NERC. A verification code will be provided on the next screen.

Survey Response: Comment Form: Project 2010-07 Generator Requirements at the Transmission Interface
 Comment Request - Project 2010-07 Generator Requirements at the Transmission Interface
 Response GUID: cfc8fd80-99cf-4830-837d-21d336f3b788
 Started: 11/16/2011 7:59:30 PM
 Completed: 11/16/2011 8:09:58 PM

Page 2

1) **Individual or group.**
 Group

Page 4

2) **Group Name**
 MRO NSRF

3) **Lead Contact**
 Will SMith

4) **Contact Organization**
 MRO

5) **Registered Ballot body segment (check all applicable industry segments)**

- 1 - Transmission Owners
- 2 - RTOs and ISOs
- 3 - Load-serving Entities
- 4 - Transmission-dependent Utilities
- 5 - Electric Generators
- 6 - Electricity Brokers, Aggregators
- 7 - Large Electricity End Users
- 10 - Regional Reliability Organizations/Regional Entities

6) **Contact Telephone**

###-###-####
 651-855-1718

7) **Contact E-mail**

ws.smith@midwestreliability.org

8) **Please complete the following information.**

	Additional Member	Additional Organization	Region	Segment Selection
1.	Mahmood Safi	OPPD	MRO	1, 3, 5, 6
2.	Chuck Lawrence	ATC	MRO	1

3.	Jodi Jenson	WAPA	MRO	1, 6
4.	Ken Goldsmith	ALTW	MRO	4
5.	Alice Ireland	XCEL/NSP	MRO	1, 3, 5, 6
6.	Dave Rudolph	BEPC	MRO	1, 3, 5, 6
7.	Eric Ruskamp	LES	MRO	1, 3, 5, 6
8.	Joe DePoorter	MGE	MRO	3, 4, 5, 6
9.	Scott Nickels	RPU	MRO	4
10.	Terry Harbour	MEC	MRO	1, 3, 5, 6
11.	Marie Knox	MISO	MRO	2
12.	Lee Kittelson	OTP	MRO	1, 3, 4, 5
13.	Scott Bos	MPW	MRO	1, 3, 5, 6
14.	Tony Eddleman	NPPD	MRO	1, 3, 5
15.	Mike Brytowski	GRE	MRO	1, 3, 5, 6
16.	Richard Burt	MPC	MRO	1, 3, 5, 6
17.				
18.				
19.				
20.				
21.				
22.				
23.				
24.				
25.				

Page 5

9) **Question 1**

1. Based on stakeholder comment, the SDT clarified the applicability language of FAC-001-1 and removed the Generator Owner from R4. Do you support the proposed redline changes to FAC-001-1? (Please refer to the posted FAC-001-1 technical justification document for more information about the SDT's rationale for its changes.)

Yes

Page 6

10) **Question 2**

2. Do you support the one year compliance timeframe for Generator Owners as proposed in the Implementation Plan for FAC-001-1?

Yes

Page 7

11) **Question 3**

3. With respect to FAC-003, many commenters focused on the half-mile qualifier in FAC-003. Some commenters found the half-mile length too short, others found it too long, and still others found the choice among the starting points of the switchyard, generating station, or generating substation to be confusing. The drafting team attempted to address all of these concerns with its latest proposed standard changes. The qualifier now reads: "...that extends greater than one mile beyond the fenced area of the generating station switchyard..." We believe that the one mile length is a reasonable approximation of line of sight, and that using a fixed starting point (at the fenced area of the generation station switchyard) eliminates confusion and any discretion on the part of a Generator Owner or an auditor. Finally, we maintain that it is appropriate to include this qualifier for Generator Owners because there is a very low risk from vegetation within the line of sight, and thus the formal steps in this standard are not necessary to ensure reliability of these lines.

Taking into consideration that only one of the versions of FAC-003 will actually be

implemented, a decision that will be made as Project 2007-07—Vegetation Management moves forward, do you support the proposed redline changes to FAC-003-X and FAC-003-3?

No

12) Question 3 Comments:

The NSRF agrees with the drafting committees desire to eliminate arbitrary and capricious behavior of auditors and industry staff by precisely defining the point at which measurement starts for the length of transmission line.

The concern the NSRF has with the proposed wording is that many generating station may not have a "generating station switchyard" as implied by the proposed wording. Often the generator leads (e.g. 20 kV) will exit the generator and connect to transformers located in transformer bays directly adjacent to the plant. From the transformers the now greater than 200 kV lines will be routed to the point of interconnect or a generating unit switchyard, possibly miles or yards away.

By no one's definitions would the transformer bays adjacent to the plant be considered a switchyard. The plant fence may be yards or hundreds of yards from the bays and on a multiple unit site, there may be a site fence or boundary, which could be comprise of fences, security patrols, or other barriers yards or miles from the transformer but enveloping the switchyard.

The valid assumption made by the drafting team is that transmission lines within an area tightly controlled by the generator operator poses very little risk to the BES as a result of vegetation contact. This assumption is based on the valid observation that these areas are routinely occupied and observed by station personnel and as a result unexpected and unacceptable vegetation growth is highly unlikely because it is controlled by routine maintenance. It also correctly assumes that some distance past the controlled area is acceptable since this area would also be under near continuous observation.

The problem comes in defining both a tightly controlled area and a line of site. We suggest the following:

Controlled Area: A perimeter around a power plant, power plants, or switchyard which is prevents intrusion by the use of physical barriers, observation, or electronic monitoring and is routinely occupied such that unexpected and unacceptable vegetation growth would be observed and correct as a matter of routine maintenance.

Line of Sight: NSRF recommends a two kilometer distance from the controlled area perimeter. Our assessment is that an individual of average height would have a line of site of approximately 4 Kilometers. Therefore, we recommended a distance of 2 kilometers from the Controlled Area of the plant to provide margin.

The revised applicability statement would read as follows:

"Generator Owner that owns an overhead transmission line(s) that extends greater than 2.0 kilometers beyond the Controlled Area of the generating station up to the point of interconnection with a Transmission Owner's Facility and is operated at 200 kV and above and any lower voltage lines designated by the Regional Entity as critical to the reliability of the electric system in the region.

Furthermore we applaud the committee for using the metric system to identify the acceptable distance for this standard and urge it to remove all references to English units. We strongly suggest this drafting team and all future drafting team abandon the anachronistic English measurement system. This archaic system, based on the length of an average barley corn, should be abandon in all scientific and engineering endeavors.

Page 8

13) Question 4

4. Do you support compliance timeframe for Generator Owners as included and explained in the Implementation Plans for FAC-003-X?

Yes

14) Question 4 Comments:

There may be a typographical error on the effective date. As currently drafted the standard states:

In those jurisdictions where regulatory approval is required, Requirement R1 applied to the Generator Owner becomes effective on the first calendar day of the first calendar quarter one year after the date of the order approving the standard from applicable regulatory authorities where such explicit approval for all requirements is required. In those jurisdictions where no regulatory approval is required, Requirement R3 becomes effective on the first day of the first calendar quarter one year following Board of Trustees adoption.

Should it be worded as follows?

In those jurisdictions where regulatory approval is required, Requirement R1 applied to the Generator Owner becomes effective on the first calendar day of the first calendar quarter one year after the date of the order approving the standard from applicable regulatory authorities where such explicit approval for all requirements is required. In those jurisdictions where no regulatory approval is required, Requirement R3 R1 becomes effective on the first day of the first calendar quarter one year following Board of Trustees adoption.

Page 9

15) Question 5

5. In the FAC-003-3 implementation plan, the SDT has attempted to account for a number of different scenarios that could play out with respect to the filing and approvals of FAC-003-2 and FAC-003-3. Do you support this approach? If there are other scenarios that the SDT needs to account for, please suggest them here.

Yes

Page 10

16) Question 6

6. In its technical justification document, the SDT reviews all standards that had been proposed for substantive modification in the Ad Hoc Group's original support and explains why, with the exception of FAC-003, modifying them would not provide any reliability benefit. Do you support these justifications? If you believe the SDT needs to add more information to its rationale for any of these decisions, please include suggested language here.

No

17) Question 6 Comments:

The NSRF has one concern with the current justification and definitions. At some point, if enough interconnections are made to generator outlet leads in accordance with FAC-001, the original generator operator will be a Transmission Operator and a Transmission Owner. This point in time needs to be explicitly defined by the drafting team.

Page 11

18) Question 7

7. The SDT is attempting to modify a set of standards so that radial generator interconnection Facilities are appropriately accounted for in NERC's Reliability Standards, both to close reliability gaps and to prevent the unnecessary registration of GOs and GOPs at TOs and TOPs. Does the set of standards currently posted achieve this goal?

Yes

Page 12

19) Question 8

8. If you answered "yes" to Question 7, are the modifications the SDT has made in this posting the appropriate ones?

Yes

20) Question 8 Comments:

The NSRF agrees if the drafting team incorporates as suggested improvements

--

Powered by CHECKBOX® Survey Software - ©2007 Prezza Technologies, Inc.