UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

North American Electric Reliability Corporation	**)**	**Docket No. _____**
	)	

PETITION OF THE NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION FOR APPROVAL OF PROPOSED RELIABILITY STANDARD FAC-008-5 – FACILITY RATINGS

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February 19, 2021

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Pursuant to Section 215(d)(1) of the Federal Power Act ("FPA")[1] and Section 39.5[2] of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations, the North American Electric Reliability Corporation ("NERC")[3] hereby submits for Commission approval proposed Reliability Standard FAC-008-5 (Facility Ratings).

Proposed Reliability Standard FAC-008-5 reflects the retirement of Requirement R7 of the currently effective standard. This proposal was recommended following the first phase of work under the NERC Standards Efficiency Review. This initiative, which began in 2017, reviewed the body of NERC Reliability Standards to identify those Reliability Standards and requirements that were administrative in nature, duplicative to other standards, or provided no benefit to reliability. As explained more fully herein, currently effective Reliability Standard FAC-008-3 Requirement R7 is redundant to those in other Reliability Standards and is not needed for reliability. Other Reliability Standard provisions help ensure that the entities that have the responsibility to plan and

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1 16 U.S.C. § 824o.

2 18 C.F.R. § 39.5.

3 The Commission certified NERC as the electric reliability organization ("ERO") in accordance with Section 215 of the FPA on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006), *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006), *aff'd sub nom. Alcoa, Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

operate the Bulk Power System have the data they need for operations and planning. In its Order No. 873 remanding a previously proposed version of the FAC-008 Reliability Standard, the Commission agreed that the retirement of Requirement R7 from the standard would not result in a reliability gap.[4]

NERC requests that the Commission approve proposed Reliability Standard FAC-008-5, as shown in **Exhibit A**, as just, reasonable, not unduly discriminatory or preferential, and in the public interest. NERC also requests that the Commission approve: (i) the associated Violation Risk Factors ("VRFs") and Violation Severity Levels ("VSLs") (**Exhibit D**), which are generally unchanged from the currently effective version of the standard; (ii) the retirement of currently effective Reliability Standard FAC-008-3; and (iii) the proposed implementation plan (**Exhibit B**).

As required by Section 39.5(a)[5] of the Commission's regulations, this petition presents the technical basis and purpose of the proposed Reliability Standard, a demonstration that the proposed standard meets the criteria identified by the Commission in Order No. 672[6] (**Exhibit C**), and a summary of the standard development history (**Exhibit E**). The NERC Board of Trustees adopted the proposed Reliability Standard on February 4, 2021.

This petition is organized as follows: Section I of the petition provides the individuals to whom notices and communications related to the filing should be provided. Section II provides relevant background regarding: (i) the regulatory structure governing the Reliability Standards approval process; (ii) the Standards Efficiency Review and the Commission's Order No. 873

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4 *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards under the NERC Standards Efficiency Review*, Order No. 873, 172 FERC ¶ 61,225 at P 38 (2020) [hereinafter Order No. 873].

5 18 C.F.R. § 39.5(a).

6 The Commission specified in Order No. 672 certain general factors it would consider when assessing whether a particular Reliability Standard is just and reasonable. *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, 114 FERC ¶ 61,104, at P 262, 321-37 ("Order No. 672"), *order on reh'g*, Order No. 672-A, 114 FERC ¶ 61,328 (2006).

regarding previous NERC proposals originating from this initiative; and (iii) information on the development of proposed Reliability Standard FAC-008-5. Section III of the petition provides an overview and justification for proposed Reliability Standard FAC-008-5. Section IV of the petition provides a summary of the proposed implementation plan.

I. NOTICES AND COMMUNICATIONS

Notices and communications with respect to this filing may be addressed to the following:

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II. BACKGROUND

A. Regulatory Framework

By enacting the Energy Policy Act of 2005,[7] Congress entrusted the Commission with the duties of approving and enforcing rules to ensure the reliability of the Bulk-Power System ("BPS"), and with the duties of certifying an ERO that would be charged with developing and enforcing mandatory Reliability Standards, subject to Commission approval. Section 215(b)(1)[8] of the FPA states that all users, owners, and operators of the BPS in the United States will be subject to Commission-approved Reliability Standards. Section 215(d)(5)[9] of the FPA authorizes the Commission to order the ERO to submit a new or modified Reliability Standard. Section

7 16 U.S.C. § 824o.

8 *Id.* § 824o(b)(1).

9 *Id.* § 824o(d)(5).

39.5(a)[10] of the Commission's regulations requires the ERO to file with the Commission for its approval each new Reliability Standard that the ERO proposes should become mandatory and enforceable in the United States, and each modification to a Reliability Standard that the ERO proposes should be made effective.

The Commission is vested with the regulatory responsibility to approve Reliability Standards that protect the reliability of the BPS and to ensure that Reliability Standards are just, reasonable, not unduly discriminatory or preferential, and in the public interest. Pursuant to Section 215(d)(2) of the FPA[11] and Section 39.5(c)[12] of the Commission's regulations, the Commission will give due weight to the technical expertise of the ERO with respect to the content of a Reliability Standard.

B. NERC Reliability Standards Development Procedure

Proposed Reliability Standard FAC-008-5 was developed in an open and fair manner and in accordance with the Commission-approved Reliability Standard development process. NERC develops Reliability Standards in accordance with Section 300 (Reliability Standards Development) of its Rules of Procedure and the NERC Standard Processes Manual.[13]

In its order certifying NERC as the Commission's ERO, the Commission found that NERC's rules provide for reasonable notice and opportunity for public comment, due process, openness, and a balance of interests in developing Reliability Standards,[14] and thus satisfy several of the Commission's criteria for approving Reliability Standards.[15] The development process is

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10 18 C.F.R. § 39.5(a).

11 16 U.S.C. § 824o(d)(2).

12 18 C.F.R. § 39.5(c)(1).

13 The NERC Rules of Procedure, including Appendix 3A, NERC Standard Processes Manual, are available at http://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx.

14 *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 at P 250 (2006).

15 Order No. 672 at PP 268, 270.

open to any person or entity with a legitimate interest in the reliability of the BPS. NERC considers the comments of all stakeholders. Stakeholders must approve, and the NERC Board of Trustees must adopt, a new or revised Reliability Standard before NERC submits the Reliability Standard to the Commission for approval.

C. The Standards Efficiency Review and Order No. 873

After a decade of developing and implementing mandatory Reliability Standards in the United States, NERC launched the Standards Efficiency Review in 2017. This comprehensive, multi-year review project comprised a key element of NERC's plan to achieve its long-term strategic goal of establishing risk-based controls to minimize BPS reliability risk while also driving operational efficiencies and effectiveness.[16]

For the first phase of work, review teams consisting of industry experts in Real-time operations, long-term planning, and operations planning performed a comprehensive review of the operations and planning Reliability Standards. The purpose of this review was to identify Reliability Standard requirements that provide little or no benefit to reliability and should be retired. NERC then initiated the standard development process to consider the retirement recommendations resulting from the phase one work.

In June 2019, following the conclusion of the standard development process, NERC submitted a series of standard retirement proposals to the Commission.[17] Among the proposals,

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[16] *See ERO Enterprise Long-Term Strategy* (Dec. 2019), available on NERC's website at https://www.nerc.com/AboutNERC/Pages/Strategic-Documents.aspx.

[17] *See Petition of NERC for Approval of Revised and Retired Reliability Standards under the NERC Standards Efficiency Review*, Docket No. RM19-17-000 (June 7, 2019) (proposals relating to retirements in the FAC, INT, MOD, and PRC Reliability Standards families) and *Petition of NERC for Approval of Reliability Standards IRO-002-7, TOP-001-5, and VAR-001-6*, Docket No. RM19-16-000 (June 7, 2019). NERC subsequently withdrew its VAR-001-6 proposal. *See Notice of Withdrawal of NERC for Proposed Reliability Standard VAR-001-6*, Docket No. RM19-16-000 (May 14, 2020).

NERC submitted for Commission approval proposed Reliability Standard FAC-008-4, in which NERC proposed to retire Requirements R7 and R8 of currently effective Reliability Standard FAC-008-3.

In September 2020, the Commission issued Order No. 873 regarding NERC's retirement proposals.[18] In this order, the Commission remanded proposed Reliability Standard FAC-008-4 to NERC for further consideration, citing concerns with the proposed retirement of Requirement R8 of the currently effective standard.[19] The Commission approved: (i) the retirement of four Reliability Standards in their entirety (FAC-013-2, INT-004-3.1, INT-010.2.1, and MOD-020-0); and (ii) five modified Reliability Standards in which individual requirements were proposed for retirement (INT-006-5, INT-009-3, PRC-004-6, IRO-002-7, and TOP-001-5).[20] The Commission declined to take action on NERC's proposal regarding the MOD A Reliability Standards, pending further action in a separate proceeding involving the successor North American Energy Standards Board ("NAESB") business practice standards.[21]

D. Project 2018-03 Standards Efficiency Review Retirements

Following the issuance of Order No. 873, NERC recalled the Project 2018-03 Standards Efficiency Review Retirements drafting team (roster included as **Exhibit F**) to consider further steps regarding the remanded FAC-008 Reliability Standard. The standard drafting team determined to develop a new version of the Reliability Standard, proposed Reliability Standard

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18 *See* Order No. 873 at PP 1-5 (summary).

19 *Id.* at PP 37-40.

20 *Id.* at P 26.

21 *Id.* at P 4. The MOD A Reliability Standards proposed for retirement were: MOD-001-1a (Available Transmission System Capability), MOD-004-1 (Capacity Benefit Margin), MOD-008-1 (Transmission Reliability Margin Calculation Methodology), MOD-028-2 (Area Interchange Methodology), MOD-029-2a (Rated System Path Methodology), and MOD-030-3 (Flowgate Methodology).

FAC-008-5, in which only Requirement R7 of the currently effective standard would be proposed for retirement.

The proposed standard was posted for formal comment and ballot from November 30, 2020 through January 13, 2021, and for final ballot from January 19, 2021 through January 28, 2021. The proposed standard achieved 95.96% approval with 91.04% quorum. The NERC Board of Trustees adopted the proposed standard on February 4, 2020. A summary of the development history and the complete record of development is attached to this petition as **Exhibit E**.

III. JUSTIFCATION FOR APPROVAL

In this petition, NERC submits for Commission approval proposed Reliability Standard FAC-008-5 – Facility Ratings, in which Requirement R7 of the currently effective standard is proposed for retirement. As discussed below, Requirement R7 is not necessary for reliability. As shown in the redline included in **Exhibit A**, NERC has struck the requirement in its entirety and replaced the text with the word "Reserved." Corresponding revisions have also been made to the VRFs, VSLs, and measures.

The proposed Reliability Standard continues to meet the Commission's criteria for approval in Order No. 672 and is just, reasonable, not unduly discriminatory, and in the public interest. NERC respectfully requests that the Commission approve the proposed Reliability Standard, to become effective in accordance with the proposed implementation plan discussed in Section IV.

1. Currently Effective Reliability Standard FAC-008-3

Reliability Standard FAC-008-3 – Facility Ratings was approved by the Commission in 2011.[22] The standard was developed in response to Commission directives from Order No. 693 to

[22] *Order Approving Reliability Standard*, 137 FERC ¶ 61,123 (2011).

modify the FAC-008 standard to require entities to: (i) document underlying assumptions and methods used to determine normal and emergency facility ratings; (ii) develop facility ratings consistent with industry standards developed through an open, transparent, and validated process; and (iii) for each facility, identify the limiting component and, for critical facilities, the resulting increase in rating if that component is no longer limiting.[23] In 2013, the Commission approved the retirement of Requirements R4 and R5 following NERC's "paragraph 81" initiative.[24]

In 2019, NERC proposed Reliability Standard FAC-008-4, in which NERC proposed to retire Requirements R7 and R8 of the standard. As previously noted, the Commission remanded proposed Reliability Standard FAC-008-4 in Order No. 873 due to concerns with the proposed retirement of Requirement R8.

2. Justification for Approval for Proposed Reliability Standard FAC-008-5

The purpose of proposed Reliability Standard FAC-008-5, which remains unchanged from the currently effective version of the standard, is to "to ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits."

In proposed Reliability Standard FAC-008-5 NERC proposes to retire Requirement R7 of the currently effective standard because this requirement is redundant to those in other Reliability Standards and is therefore not needed for reliability.

Reliability Standard FAC-008-3 Requirement R7 requires Generator Owners and

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[23] *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, 118 FERC ¶ 61,218 at PP 739, 742, 756 (2007).

[24] *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards*, Order No. 788, 145 FERC ¶ 61,147 at P 17 (2013). In proposed Reliability Standard FAC-008-5, NERC has struck the text of these requirements and replaced them with the word "Reserved."

Transmission Owners to provide certain information to requesting Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s), and Transmission Operator(s) regarding their Facilities, as follows:

> **R7.** Each Generator Owner shall provide Facility Ratings (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) as scheduled by such requesting entities.

In the years since Reliability Standard FAC-008-3 was developed, NERC has developed other Reliability Standards that render the data provision obligations of Requirement R7 redundant. Specifically, Reliability Standards MOD-032-1, IRO-010-2, and TOP-003-3 contain provisions to help ensure that the entities that have the responsibility to plan and operate the Bulk Power System have the data they need from Generator Owners and Transmission Owners for operations and planning.

Requirement R1 of Reliability Standard MOD-032-1 – Data for Power System Modeling and Analysis requires the Planning Coordinator and Transmission Planner to develop modeling data requirements and reporting procedures including the data listed in Attachment 1 to the standard. This data would include information on power capabilities and Facility Ratings.[25] Requirement R2 requires the Generator Owner and Transmission Owner to provide the requested information.

Requirement R1 of Reliability Standard IRO-010-2 – Reliability Coordinator Data Specification and Collection requires the Reliability Coordinator to maintain a documented specification for the data necessary to perform its Operational Planning Analyses, Real-time

[25] *See* Reliability Standard MOD-032-1 Attachment 1, steady-state column, Items 3, 3(f), 4(c) and 6(g).

monitoring, and Real-time Assessments. This data necessarily includes Facility Ratings as inputs to System Operating Limit monitoring. Requirement R3 requires the Transmission Owner and Generator Owner to provide requested data. Similarly, Requirement R1 of Reliability Standard TOP-003-3 – Operational Reliability Data requires the Transmission Operator to maintain a documented data specification (Requirement R1) and for the Transmission Owner and Generator Owner to provide the requested data (Requirement R5).

While the provision of Facility Ratings data to Transmission Owners is not specified by these standards listed above, such provision is not necessary as Transmission Owners have a more limited role that does not involve the planning and operation of the Bulk Power System. In Order No. 873, the Commission noted the previous history of the requirement, which did not include Transmission Owners as receiving entities, and stated:

> Regarding Reliability Standard FAC-008-3, Requirement R7, we are persuaded that retiring Requirement R7 will not result in a reliability gap because Requirement R7 is redundant or otherwise provides little or no reliability benefit. We agree with NERC that, unlike transmission operators and transmission planners that need and will continue to receive facility ratings information under other Reliability Standards, transmission owners do not need to exchange facility ratings because they have a more limited functional role that does not involve planning and operating the Bulk-Power System.[26]

As Reliability Standard FAC-008-3 Requirement R7 is now redundant to other more robust Reliability Standards and is no longer needed for reliability, NERC proposes to retire this requirement in proposed Reliability Standard FAC-008-5. The retirement of this Requirement would not have an adverse impact on reliability and is in the public interest.

[26] Order No. 873 at P 38.

IV. EFFECTIVE DATE

NERC respectfully requests that the Commission approve the implementation plan attached to this petition as **Exhibit B**. The proposed implementation plan provides that proposed Reliability Standard FAC-008-5 would become effective on the first day of the first calendar quarter that is three months after applicable regulatory approval. The currently effective version of the standard would be retired immediately prior to the effective date of the revised Reliability Standard. This implementation timeline reflects consideration that entities may need time to update their internal systems and documentation to reflect the new Reliability Standard version number.

V. CONCLUSION

For the reasons set forth above, NERC respectfully requests that the Commission approve:

- Proposed Reliability Standard FAC-008-5 (Facility Ratings) and the associated elements, as shown in **Exhibit A;**
- the retirement of currently effective Reliability Standard FAC-008-3; and
- The implementation plan included in **Exhibit B**.

Respectfully submitted,

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NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Exhibit A-1

Proposed Reliability Standard FAC-008-5
Clean

A. Introduction

1. **Title:** Facility Ratings

2. **Number:** FAC-008-5

3. **Purpose:** To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits.

4. **Applicability:**

   4.1. Transmission Owner

   4.2. Generator Owner

5. **Effective Date:** See Implementation Plan.

B. Requirements and Measures

R1. Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facility(ies) up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up transformer. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

1.1. The documentation shall contain assumptions used to rate the generator and at least one of the following:

- Design or construction information such as design criteria, ratings provided by equipment manufacturers, equipment drawings and/or specifications, engineering analyses, method(s) consistent with industry standards (e.g. ANSI and IEEE), or an established engineering practice that has been verified by testing or engineering analysis.
- Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.

1.2. The documentation shall be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

M1. Each Generator Owner shall have documentation that shows how its Facility Ratings were determined as identified in Requirement 1.

R2. Each Generator Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner that contains all of the following. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

2.1. The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronic Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

2.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R2, Part 2.1 including identification of how each of the following were considered:

2.2.1. Equipment Rating standard(s) used in development of this methodology.

2.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

2.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

2.2.4. Operating limitations.[1]

2.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

2.4. The process by which the Rating of equipment that comprises a Facility is determined.

2.4.1. The scope of equipment addressed shall include, but not be limited to, conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

2.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M2. Each Generator Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 2, Parts 2.1 through 2.4.

R3. Each Transmission Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned Facilities (except for those generating unit Facilities addressed in R1 and R2) that contains all of the following: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

3.1. The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronics Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

[1] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

3.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R3, Part 3.1 including identification of how each of the following were considered:

3.2.1. Equipment Rating standard(s) used in development of this methodology.

3.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

3.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

3.2.4. Operating limitations.[2]

3.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

3.4. The process by which the Rating of equipment that comprises a Facility is determined.

3.4.1. The scope of equipment addressed shall include, but not be limited to, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

3.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M3. Each Transmission Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 3, Parts 3.1 through 3.4.

R4. Reserved.

M4. Reserved.

R5. Reserved.

M5. Reserved.

R6. Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

M6. Each Transmission Owner and Generator Owner shall have evidence to show that its Facility Ratings are consistent with the documentation for determining its Facility Ratings as specified in Requirement R1 or consistent with its Facility Ratings methodology as specified in Requirements R2 and R3 (Requirement R6).

R7. Reserved.

M7. Reserved.

[2] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

R8. Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center:

8.2.1. Identity of the existing next most limiting equipment of the Facility

8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

M8. Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R8.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority: "Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Compliance Monitoring and Enforcement Processes:

- Self-Certifications
- Spot Checking
- Compliance Audits
- Self-Reporting

- Compliance Violation Investigations
- Complaints

1.3. Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The Generator Owner shall keep its current documentation (for R1) and any modifications to the documentation that were in force since last compliance audit period for Measure M1 and Measure M6.
- The Generator Owner shall keep its current, in force Facility Ratings methodology (for R2) and any modifications to the methodology that were in force since last compliance audit period for Measure M2 and Measure M6.
- The Transmission Owner shall keep its current, in force Facility Ratings methodology (for R3) and any modifications to the methodology that were in force since the last compliance audit for Measure M3 and Measure M6.
- The Transmission Owner and Generator Owner shall keep its current, in force Facility Ratings and any changes to those ratings for three calendar years for Measure M6.
- The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
- If a Generator Owner or Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant.
- The Compliance Enforcement Authority shall keep the last audit and all subsequent compliance records.

1.4. Compliance Monitoring and Enforcement Program: As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.1.	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.2.	The Generator Owner failed to provide documentation for determining its Facility Ratings.
R2.	The Generator Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology did not address all the components of Requirement R2, Part 2.4. OR The Generator Owner failed to include in its Facility Rating Methodology, three of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in Requirement R2, Part 2.3 OR The Generator Owner failed to include in its Facility Rating Methodology four or more of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R3.	The Transmission Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology did not address either of the following Parts of Requirement R3: • 3.4.1 • 3.4.2 OR The Transmission Owner failed to include in its Facility Rating methodology three of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology failed to recognize a Facility's rating based on the most limiting component rating as required in Requirement R3, Part 3.3 OR The Transmission Owner failed to include in its Facility Rating methodology four or more of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4
R4. Reserved.				
R5. Reserved.				

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R6.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for 5% or less of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 5% or more, but less than up to (and including) 10% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 10% up to (and including) 15% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than15% of its solely owned and jointly owned Facilities. (R6)
R7. Reserved.				
R8.	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to and including 15 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 100%,	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 95%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 90%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 85% of the required Rating information to all of the

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	but not less than or equal to 95% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but the information was provided up to and including 15 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 100%, but not less than or equal to 95% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 90% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more 15 calendar days but less than or equal to 25 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 95%, but not less than or equal to 90% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 85% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 25 calendar days but less than or equal to 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 90%, but no less than or equal to 85% of the required Rating information to the requesting entity. (R8, Part 8.2)	requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 85 % of the required Rating information to the requesting entity. (R8, Part 8.2) OR The responsible entity failed to provide its Rating information to the requesting entity. (R8, Part 8.1)

D. Regional Variances

None.

E. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	Feb 7, 2006	Approved by Board of Trustees	New
1	Mar 16, 2007	Approved by FERC	New
2	May 12, 2010	Approved by Board of Trustees	Complete Revision, merging FAC_008-1 and FAC-009-1 under Project 2009-06 and address directives from Order 693
3	May 24, 2011	Addition of Requirement R8	Project 2009-06 Expansion to address third directive from Order 693
3	May 24, 2011	Adopted by NERC Board of Trustees	
3	November 17, 2011	FERC Order issued approving FAC-008-3	
3	May 17, 2012	FERC Order issued directing the VRF for Requirement R2 be changed from “Lower” to “Medium”	
3	February 7, 2013	R4 and R5 and associated elements approved by NERC Board of Trustees for retirement as part of the Paragraph 81 project (Project 2013-02) pending applicable regulatory approval.	
3	November 21, 2013	R4 and R5 and associated elements approved by FERC for retirement as part of the Paragraph 81 project (Project 2013-02)	
4	May 9, 2020	R7 and R8 and associated elements adopted by NERC Board of Trustees for retirement as part of Project 2018-03 Standards Efficiency Review Retirements.	
4	September 17, 2020	Remanded by FERC (Order No. 873).	Withdrawn
5	February 4, 2021	Adopted by NERC Board of Trustees	Requirement R8 and associated elements restored in response

Version	Date	Action	Change Tracking
			to FERC Order No. 873.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Exhibit A-2

Redline to Last Approved (FAC-008-3)

A. Introduction

1. **Title:** Facility Ratings

2. **Number:** FAC-008-~~3~~5

3. **Purpose:** To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits.

4. **Applicability:**

   4.1. Transmission Owner

   4.2. Generator Owner

5. **Effective Date:** See Implementation Plan.~~The first day of the first calendar quarter that is twelve months beyond the date approved by applicable regulatory authorities, or in those jurisdictions where regulatory approval is not required, the first day of the first calendar quarter twelve months following BOT adoption~~See Implementation Plan.

B. Requirements and Measures

R1. Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facility(ies) up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up transformer. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

1.1 The documentation shall contain assumptions used to rate the generator and at least one of the following:

- Design or construction information such as design criteria, ratings provided by equipment manufacturers, equipment drawings and/or specifications, engineering analyses, method(s) consistent with industry standards (e.g. ANSI and IEEE), or an established engineering practice that has been verified by testing or engineering analysis.
- Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.

1.2 The documentation shall be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

M1. Each Generator Owner shall have documentation that shows how its Facility Ratings were determined as identified in Requirement 1.

R2. Each Generator Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner that contains all of the following. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

2.1 The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronic Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

2.2 The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R2, Part 2.1 including identification of how each of the following were considered:

2.2.1 Equipment Rating standard(s) used in development of this methodology.

2.2.2 Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

2.2.3 Ambient conditions (for particular or average conditions or as they vary in real-time).

2.2.4 Operating limitations.[1]

2.3 A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

2.4 The process by which the Rating of equipment that comprises a Facility is determined.

2.4.1 The scope of equipment addressed shall include, but not be limited to, conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

2.4.2 The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M2. Each Generator Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 2, Parts 2.1 through 2.4.

R3. Each Transmission Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned Facilities (except for those generating unit Facilities addressed in R1 and R2) that contains all of the following: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

3.1 The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronics Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

[1] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

3.2 The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R3, Part 3.1 including identification of how each of the following were considered:

3.2.1 Equipment Rating standard(s) used in development of this methodology.

3.2.2 Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

3.2.3 Ambient conditions (for particular or average conditions or as they vary in real-time).

3.2.4 Operating limitations.[2]

3.3 A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

3.4 The process by which the Rating of equipment that comprises a Facility is determined.

3.4.1 The scope of equipment addressed shall include, but not be limited to, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

3.4.2 The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M3. Each Transmission Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 3, Parts 3.1 through 3.4.

R4. Reserved.~~Each Transmission Owner shall make its Facility Ratings methodology and each Generator Owner shall each make its documentation for determining its Facility Ratings and its Facility Ratings methodology available for inspection and technical review by those Reliability Coordinators, Transmission Operators, Transmission Planners and Planning Coordinators that have responsibility for the area in which the associated Facilities are located, within 21 calendar days of receipt of a request. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]* (Retirement approved by FERC effective January 21, 2014.)~~

M4. Reserved. ~~Each Transmission Owner shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it made its Facility Ratings methodology available for inspection within 21 calendar days of a request in accordance with Requirement 4. The Generator Owner shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it made its documentation for determining its Facility Ratings or its Facility Ratings methodology available for inspection within 21 calendar days of a request in~~

[2] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

~~accordance with Requirement R4. (Retirement approved by NERC BOT pending applicable regulatory approval.).~~

R5. Reserved. ~~If a Reliability Coordinator, Transmission Operator, Transmission Planner or Planning Coordinator provides documented comments on its technical review of a Transmission Owner's Facility Ratings methodology or Generator Owner's documentation for determining its Facility Ratings and its Facility Rating methodology, the Transmission Owner or Generator Owner shall provide a response to that commenting entity within 45 calendar days of receipt of those comments. The response shall indicate whether a change will be made to the Facility Ratings methodology and, if no change will be made to that Facility Ratings methodology, the reason why. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]* (Retirement approved by FERC effective January 21, 2014.)~~

M5. Reserved.~~If the Reliability Coordinator, Transmission Operator, Transmission Planner or Planning Coordinator provides documented comments on its technical review of a Transmission Owner's or Generator Owner's Facility Ratings methodology or a Generator Owner's documentation for determining its Facility Ratings, the Transmission Owner or Generator Owner shall have evidence, (such as a copy of a dated electronic or hard copy note, or other comparable evidence from the Transmission Owner or Generator Owner addressed to the commenter that includes the response to the comment,) that it provided a response to that commenting entity in accordance with Requirement R5. (Retirement approved by NERC BOT pending applicable regulatory approval.)~~

R6. Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

M6. Each Transmission Owner and Generator Owner shall have evidence to show that its Facility Ratings are consistent with the documentation for determining its Facility Ratings as specified in Requirement R1 or consistent with its Facility Ratings methodology as specified in Requirements R2 and R3 (Requirement R6).

R7. Reserved.~~Each Generator Owner shall provide Facility Ratings (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) as scheduled by such requesting entities. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*~~

M7. Reserved.~~Each Generator Owner shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R7.~~

R8. Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

8.1 As scheduled by the requesting entities:

3.4.3 Facility Ratings

3.4.4 Identity of the most limiting equipment of the Facilities

8.2 Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center:

8.2.1 Identity of the existing next most limiting equipment of the Facility

8.2.2 The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

M8. Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R8.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority: "Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Compliance Monitoring and Enforcement Processes:

- Self-Certifications
- Spot Checking
- Compliance Audits
- Self-Reporting

- Compliance Violation Investigations
- Complaints

1.3. Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The Generator Owner shall keep its current documentation (for R1) and any modifications to the documentation that were in force since last compliance audit period for Measure M1 and Measure M6.
- The Generator Owner shall keep its current, in force Facility Ratings methodology (for R2) and any modifications to the methodology that were in force since last compliance audit period for Measure M2 and Measure M6.
- The Transmission Owner shall keep its current, in force Facility Ratings methodology (for R3) and any modifications to the methodology that were in force since the last compliance audit for Measure M3 and Measure M6.
- The Transmission Owner and Generator Owner shall keep its current, in force Facility Ratings and any changes to those ratings for three calendar years for Measure M6.
- ~~The Generator Owner and Transmission Owner shall each keep evidence for Measure M4, and Measure M5, for three calendar years. (Retirement approved by FERC effective January 21, 2014.)~~
- ~~The Generator Owner shall keep evidence for Measure M7 for three calendar years.~~
- The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
- If a Generator Owner or Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant.
- The Compliance Enforcement Authority shall keep the last audit and all subsequent compliance records.

Compliance Monitoring and Enforcement Program: As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" refers

to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.1.	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.2.	The Generator Owner failed to provide documentation for determining its Facility Ratings.
R2.	The Generator Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology did not address all the components of Requirement R2, Part 2.4. OR The Generator Owner failed to include in its Facility Rating Methodology, three of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in Requirement R2, Part 2.3 OR The Generator Owner failed to include in its Facility Rating Methodology four or more of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
				• 2.2.4
R3.	The Transmission Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology did not address either of the following Parts of Requirement R3: • 3.4.1 • 3.4.2 OR The Transmission Owner failed to include in its Facility Rating methodology three of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology failed to recognize a Facility's rating based on the most limiting component rating as required in Requirement R3, Part 3.3 OR The Transmission Owner failed to include in its Facility Rating methodology four or more of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R4. Reserved. ~~(Retirement approved by FERC effective January 21, 2014.)~~	~~The responsible entity made its Facility Ratings methodology or Facility Ratings documentation available within more than 21 calendar days but less than or equal to 31 calendar days after a request.~~	~~The responsible entity made its Facility Ratings methodology or Facility Ratings documentation available within more than 31 calendar days but less than or equal to 41 calendar days after a request.~~	~~The responsible entity made its Facility Rating methodology or Facility Ratings documentation available within more than 41 calendar days but less than or equal to 51 calendar days after a request.~~	~~The responsible entity failed to make its Facility Ratings methodology or Facility Ratings documentation available in more than 51 calendar days after a request. (R3)~~
R5. Reserved. ~~(Retirement approved by FERC effective January 21, 2014.)~~	~~The responsible entity provided a response in more than 45 calendar days but less than or equal to 60 calendar days after a request. (R5)~~	~~The responsible entity provided a response in more than 60 calendar days but less than or equal to 70 calendar days after a request.~~ ~~OR~~ ~~The responsible entity provided a response within 45 calendar days, and the response indicated that a change will not be made to the Facility Ratings methodology or Facility~~	~~The responsible entity provided a response in more than 70 calendar days but less than or equal to 80 calendar days after a request.~~ ~~OR~~ ~~The responsible entity provided a response within 45 calendar days, but the response did not indicate whether a change will be made to the Facility Ratings methodology or Facility~~	~~The responsible entity failed to provide a response as required in more than 80 calendar days after the comments were received. (R5)~~

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
		~~Ratings documentation but did not indicate why no change will be made. (R5)~~	~~Ratings documentation. (R5)~~	
R6.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for 5% or less of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 5% or more, but less than up to (and including) 10% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 10% up to (and including) 15% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than15% of its solely owned and jointly owned Facilities. (R6)
R7. Reserved.	~~The Generator Owner provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to and including 15 calendar days.~~	~~The Generator Owner provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days.~~	~~The Generator Owner provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days.~~	~~The Generator Owner provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days.~~ ~~OR~~ ~~The Generator Owner failed to provide its Facility~~

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
				~~Ratings to the requesting entities.~~
R8.	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to and including 15 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 100%, but not less than or equal to 95% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but the information was provided up to and including 15	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 95%, but not less than or equal to 90% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more 15 calendar days but less than or equal to 25	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 90%, but not less than or equal to 85% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 25 calendar days but less than or equal	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 85% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 35 calendar days late. (R8, Part 8.2) OR

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 100%, but not less than or equal to 95% of the required Rating information to the requesting entity. (R8, Part 8.2)	calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 95%, but not less than or equal to 90% of the required Rating information to the requesting entity. (R8, Part 8.2)	to 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 90%, but no less than or equal to 85% of the required Rating information to the requesting entity. (R8, Part 8.2)	The responsible entity provided less than 85 % of the required Rating information to the requesting entity. (R8, Part 8.2) OR The responsible entity failed to provide its Rating information to the requesting entity. (R8, Part 8.1)

D. Regional Variances

None.

E. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	Feb 7, 2006	Approved by Board of Trustees	New
1	Mar 16, 2007	Approved by FERC	New
2	May 12, 2010	Approved by Board of Trustees	Complete Revision, merging FAC_008-1 and FAC-009-1 under Project 2009-06 and address directives from Order 693
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3	November 21, 2013	R4 and R5 and associated elements approved by FERC for retirement as part of the Paragraph 81 project (Project 2013-02)	
4	~~TBD~~ May 9, 2020	R7 and R8 and associated elements adopted by NERC Board of Trustees for retirement as part of Project 2018-03 Standards Efficiency Review Retirements.	

4	September 17, 2020	Remanded by FERC (Order No. 873).	Withdrawn
5	February 4, 2021	Adopted by NERC Board of Trustees	Requirement R8 and associated elements restored in response to FERC Order No. 873.

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Exhibit B

Implementation Plan

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Implementation Plan

Project 2018-03 Standards Efficiency Review Retirements
Reliability Standard FAC-008-5

Applicable Standard(s)

- FAC-008-5 – Facility Ratings

Requested Retirement(s)

- FAC-008-3 – Facility Ratings

Applicable Entities

- Transmission Owner
- Generator Owner

Background

In 2017, NERC initiated the Standards Efficiency Review (SER). The scope of this project was to use a risk-based approach to identify potential efficiencies through retirement of Reliability Standard requirements. Following the completion of the first phase of work, the SER Standard Drafting Team (SDT) submitted a Standards Authorization Request (SAR) to the NERC Standards Committee, which the Standards Committee accepted in August 2018.

Project 2018-03 Standards Efficiency Review Retirements was initiated to consider and implement the recommendations for Reliability Standard retirements contained in the SAR.
Among other things, the SER SDT proposed retiring Requirements R7 and R8 in Reliability Standard FAC-008-3 as redundant and not needed for reliability. Proposed Reliability Standard FAC-008-4 passed final ballot on May 2, 2019; was adopted by the Board of Trustees on May 9, 2019; and was filed with the Federal Energy Regulatory Commission (FERC) on June 7, 2019 for approval.

On September 17, 2020, the Federal Regulatory Commission (FERC) issued Order No. 873.[1] With respect to proposed Reliability Standard FAC-008-4, FERC determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). FERC remanded proposed Reliability Standard FAC-008-4 to NERC for further consideration.

[1] Order No. 873, *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review*, 172 FERC ¶ 61,225 (2020), https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20on%20SER%20Retirements.pdf.

Following the FERC remand, NERC submitted a notice to the remaining applicable governmental authorities requesting that FAC-008-4 be withdrawn in their respective jurisdictions.

Proposed Reliability Standard FAC-008-5 would retire Requirement R7 of currently effective Reliability Standard FAC-008-3.

General Considerations

For Reliability Standard FAC-008-5– Facility Ratings, the standard will become effective on the first day of the first calendar quarter that is three (3) months after applicable regulatory approval. This implementation timeframe reflects consideration that entities may need time to update their internal systems and documentation to reflect the new standard version numbers.

Effective Date

Reliability Standard FAC-008-5– Facility Ratings

Where approval by an applicable governmental authority is required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Retirement Date

Reliability Standard FAC-008-3 – Facility Ratings

Reliability Standard FAC-008-3 shall be retired immediately prior to the effective date of the revised standard in the particular jurisdiction in which the revised standard is becoming effective.

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Exhibit C

Order No. 672 Criteria

EXHIBIT C

Order No. 672 Criteria

In Order No. 672,[1] the Commission identified a number of criteria it will use to analyze Reliability Standards proposed for approval to ensure they are just, reasonable, not unduly discriminatory or preferential, and in the public interest. The discussion below identifies these factors and explains how proposed Reliability Standard FAC-008-5 continues to meet or exceed the criteria.

1. **Proposed Reliability Standards must be designed to achieve a specified reliability goal and must contain a technically sound means to achieve that goal.[2]**

Proposed Reliability Standard FAC-008-5 improves upon the currently effective version by retiring a requirement (Requirement R7) that is redundant and provides little, if any, benefit to reliability. Except for corresponding changes that are necessary to the Violation Risk Factors ("VRFs"), Violation Severity Levels ("VSLs"), and measures, no other changes are proposed. As such, the proposed Reliability Standard remains designed to achieve a specified reliability goal and continues to provide a technically sound means to achieve that goal, consistent with the Commission's approval of the currently effective version of the standard.

2. **Proposed Reliability Standards must be applicable only to users, owners and operators of the bulk power system, and must be clear and unambiguous as to what is required and who is required to comply.[3]**

The proposed Reliability Standard is clear and unambiguous as to what is required and who is required to comply, in accordance with Order No. 672. An individual requirement from the

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[1] *Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards*, Order No. 672, 114 FERC ¶ 61,104, *order on reh'g*, Order No. 672-A, 114 FERC ¶ 61,328 (2006).

[2] Order No. 672 at PP 321, 324.

[3] Order No. 672 at PP 322, 325.

currently effective version of the Reliability Standard is proposed for retirement. NERC does not propose any changes to the applicability of the standard.

3. **A proposed Reliability Standard must include clear and understandable consequences and a range of penalties (monetary and/or non-monetary) for a violation.**[4]

The Violation Risk Factors ("VRFs") and Violation Severity Levels ("VSLs") for the proposed Reliability Standard continue to comport with NERC and Commission guidelines related to their assignment, as discussed further in **Exhibit D**. As noted therein, no changes are proposed to the VRFs and VSLs from the currently effective version of the standard beyond those necessary to reflect the retirement of Requirement R7.

4. **A proposed Reliability Standard must identify clear and objective criterion or measure for compliance, so that it can be enforced in a consistent and non-preferential manner.** [5]

The proposed Reliability Standard contains measures that support each requirement by clearly identifying what is required to demonstrate compliance. These measures help provide clarity regarding the manner in which the requirements will be enforced and help ensure that the requirements will be enforced in a clear, consistent, and non-preferential manner and without prejudice to any party. No changes are proposed to the measures from the currently effective versions of the standard beyond those necessary to reflect the retirement of Requirement R7.

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4 Order No. 672 at P 326.

5 Order No. 672 at P 327.

5. **Proposed Reliability Standards should achieve a reliability goal effectively and efficiently — but do not necessarily have to reflect "best practices" without regard to implementation cost or historical regional infrastructure design.[6]**

The proposed Reliability Standard would achieve its reliability goals effectively and efficiently in accordance with Order No. 672. The proposed Reliability Standard improves upon the currently effective version by retiring Requirement R7, a requirement that is now redundant to those in other Reliability Standards and is no longer needed for reliability, thereby improving the efficiency of the standards.

6. **Proposed Reliability Standards cannot be "lowest common denominator," *i.e.*, cannot reflect a compromise that does not adequately protect Bulk-Power System reliability. Proposed Reliability Standards can consider costs to implement for smaller entities, but not at consequences of less than excellence in operating system reliability.[7]**

The proposed Reliability Standard does not reflect a "lowest common denominator" approach. The retirement of Requirement R7 in proposed Reliability Standard FAC-008-5 would improve the effectiveness and efficiency of the standard and would not result in adverse impacts to reliability.

7. **Proposed Reliability Standards must be designed to apply throughout North America to the maximum extent achievable with a single Reliability Standard while not favoring one geographic area or regional model. It should take into account regional variations in the organization and corporate structures of transmission owners and operators, variations in generation fuel type and ownership patterns, and regional variations in market design if these affect the proposed Reliability Standard.[8]**

The proposed Reliability Standard continues to apply throughout North America and does not favor one geographic area or regional model.

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6 Order No. 672 at P 328.

7 Order No. 672 at P 329-30.

8 Order No. 672 at P 331.

8. **Proposed Reliability Standards should cause no undue negative effect on competition or restriction of the grid beyond any restriction necessary for reliability.[9]**

The proposed Reliability Standard would have no undue negative impact on competition. The proposed Reliability Standard would continue to require the same performance by each of the applicable functional entities, minus Requirement R7 which is proposed for retirement. The proposed Reliability Standard would not unreasonably restrict the available transmission capability or limit use of the Bulk-Power System in a preferential manner.

9. **The implementation time for the proposed Reliability Standard is reasonable.[10]**

The proposed implementation period for the proposed Reliability Standard is just and reasonable and allows entities sufficient time to update their internal documentation and other processes.

10. **The Reliability Standard was developed in an open and fair manner and in accordance with the Commission-approved Reliability Standard development process.[11]**

The proposed Reliability Standard was developed in accordance with NERC's Commission-approved, ANSI-accredited processes for developing and approving Reliability Standards. **Exhibit E** includes a summary of the development proceedings and details the processes followed to develop the proposed Reliability Standard. These processes included, among other things, comment and ballot periods. Additionally, all meetings of the drafting team were properly noticed and open to the public. The initial and final ballots achieved a quorum and exceeded the required ballot pool approval levels.

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9 Order No. 672 at P 332.

10 Order No. 672 at P 333.

11 Order No. 672 at P 334.

11. NERC must explain any balancing of vital public interests in the development of proposed Reliability Standards.[12]

NERC has identified no competing public interests regarding the request for approval of the proposed Reliability Standard. No comments were received that indicated the proposed Reliability Standard conflicts with other vital public interests.

12. Proposed Reliability Standards must consider any other appropriate factors.[13]

No other negative factors relevant to whether the proposed Reliability Standard is just and reasonable were identified.

[12] Order No. 672 at P 335.

[13] Order No. 672 at P 323.

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Exhibit D

Analysis of Violation Risk Factors and Violation Severity Levels

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Violation Risk Factor and Violation Severity Level Justifications

Project 2018-03 Standards Efficiency Review Retirements

This document provides the standard drafting team's (SDT's) justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in proposed Reliability Standard FAC-008-5. Each requirement is assigned a VRF and a VSL. These elements support the determination of an initial value range for the Base Penalty Amount regarding violations of requirements in FERC-approved Reliability Standards, as defined in the Electric Reliability Organizations (ERO) Sanction Guidelines. The SDT applied the following NERC criteria and FERC Guidelines when developing the VRFs and VSLs for the requirements.

NERC Criteria for Violation Risk Factors

High Risk Requirement

A requirement that, if violated, could directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

Medium Risk Requirement

A requirement that, if violated, could directly affect the electrical state or the capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System. However, violation of a medium risk requirement is unlikely to lead to Bulk Electric System instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to Bulk Electric System instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

Lower Risk Requirement

A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

FERC Guidelines for Violation Risk Factors

Guideline (1) – Consistency with the Conclusions of the Final Blackout Report

FERC seeks to ensure that VRFs assigned to Requirements of Reliability Standards in these identified areas appropriately reflect their historical critical impact on the reliability of the Bulk-Power System. In the VSL Order, FERC listed critical areas (from the Final Blackout Report) where violations could severely affect the reliability of the Bulk-Power System:

- Emergency operations
- Vegetation management
- Operator personnel training
- Protection systems and their coordination
- Operating tools and backup facilities
- Reactive power and voltage control
- System modeling and data exchange
- Communication protocol and facilities
- Requirements to determine equipment ratings
- Synchronized data recorders
- Clearer criteria for operationally critical facilities
- Appropriate use of transmission loading relief.

Guideline (2) – Consistency within a Reliability Standard

FERC expects a rational connection between the sub-Requirement VRF assignments and the main Requirement VRF assignment.

Guideline (3) – Consistency among Reliability Standards

FERC expects the assignment of VRFs corresponding to Requirements that address similar reliability goals in different Reliability Standards would be treated comparably.

Guideline (4) – Consistency with NERC's Definition of the Violation Risk Factor Level

Guideline (4) was developed to evaluate whether the assignment of a particular VRF level conforms to NERC's definition of that risk level.

Guideline (5) – Treatment of Requirements that Co-mingle More Than One Obligation

Where a single Requirement co-mingles a higher risk reliability objective and a lesser risk reliability objective, the VRF assignment for such Requirements must not be watered down to reflect the lower risk level associated with the less important objective of the Reliability Standard.

NERC Criteria for Violation Severity Levels

VSLs define the degree to which compliance with a requirement was not achieved. Each requirement must have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs.

VSLs should be based on NERC's overarching criteria shown in the table below:

Lower VSL	Moderate VSL	High VSL	Severe VSL
The performance or product measured almost meets the full intent of the requirement.	The performance or product measured meets the majority of the intent of the requirement.	The performance or product measured does not meet the majority of the intent of the requirement, but does meet some of the intent.	The performance or product measured does not substantively meet the intent of the requirement.

FERC Order of Violation Severity Levels

The FERC VSL guidelines are presented below, followed by an analysis of whether the VSLs proposed for each requirement in the standard meet the FERC Guidelines for assessing VSLs:

Guideline (1) – Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance

Compare the VSLs to any prior levels of non-compliance and avoid significant changes that may encourage a lower level of compliance than was required when levels of non-compliance were used.

Guideline (2) – Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties

A violation of a "binary" type requirement must be a "Severe" VSL.
Do not use ambiguous terms such as "minor" and "significant" to describe noncompliant performance.

Guideline (3) – Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement

VSLs should not expand on what is required in the requirement.

Guideline (4) – Violation Severity Level Assignment Should Be Based on a Single Violation, Not on a Cumulative Number of Violations

Unless otherwise stated in the requirement, each instance of non-compliance with a requirement is a separate violation. Section 4 of the Sanction Guidelines states that assessing penalties on a per violation per day basis is the "default" for penalty calculations.

VRF Justification for FAC-008-5, Requirement R1

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R2

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R3

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R6

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R8

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R1

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R2

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R3

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R6

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R8

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

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Exhibit E

Summary of Development History and Complete Record of Development

Summary of Development History

The following is a summary of the development record for proposed Reliability Standard FAC-008-5.

I. Overview of the Standard Drafting Team

When evaluating a proposed Reliability Standard, the Commission is expected to give "due weight" to the technical expertise of the ERO.[1] The technical expertise of the ERO is derived from the standard drafting team ("SDT") selected to lead each project in accordance with Section 4.3 of the NERC Standard Processes Manual.[2] For this project, the SDT consisted of industry experts, all with a diverse set of experiences. A roster of the Project 2018-03 Standards Efficiency Review Retirements SDT members is included in **Exhibit F**.

II. Standard Development History

A. Standard Authorization Request Development

On August 22, 2018, the Standards Committee accepted the Standard Authoriation Request (SAR) for Project 2018-03 Standards Efficiency Review and authorized posting the SAR for a 30-day formal comment period. Project 2018-03 developed a series of standard and requirement retirement proposals. In June 2019, NERC submitted these retirement proposals to the Commission, including proposed Reliability Standard FAC-008-4. Following the issuance of Order No. 873 remanding proposed FAC-008-4,[3] NERC recalled the Project 2018-03 Standards Efficiency Review Retirements drafting team to consider further steps regarding the FAC-008 Reliability Standard.

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[1] Section 215(d)(2) of the Federal Power Act; 16 U.S.C. § 824(d)(2) (2018).

[2] The NERC *Standard Processes Manual* is available at https://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/SPM_Clean_Mar2019.pdf.

[3] *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards under the NERC Standards Efficiency Review*, Order No. 873, 172 FERC ¶ 61,225 (2020).

B. First Posting - Comment Period, Initial Ballot, and Non-binding Poll

On November 19, 2020, the Standards Committee authorized initial posting of proposed Reliability Standard FAC-008-5, the associated Implementation Plan and other associated documents for a 45-day formal comment period from November 30, 2020 through January 13, 2021, with a parallel initial ballot and non-binding poll on the Violation Risk Factors ("VRFs") and Violation Severity Levels ("VSLs") held during the last 10 days of the comment period from January 4, 2021 through January 13, 2021. The initial ballot for proposed Reliability Standard FAC-008-5 received 95.91 percent approval, reaching quorum at 89.93 percent of the ballot pool. The non-binding poll for the associated VRFs and VSLs received 100 percent supportive opinions, reaching quorum at 86.61 percent of the ballot pool. There were 45 sets of responses, including comments from approximately 107 different individuals and approximately 81 companies, representing all 10 industry segments.[4]

C. Final Ballot

Proposed Reliability Standard FAC-008-5 was posted for a 10-day final ballot period from January 19, 2021 through January 28, 2021. The ballot for proposed Reliability Standard FAC-008-5 and associated documents reached quorum at 91.04 percent of the ballot pool, receiving affirmative support from 95.96 percent of the voters.

[4] NERC, *Consideration of Comments – FAC-008-5*, Project 2018-03 Standards Efficiency Review Retirements (Jan. 19, 2021), https://www.nerc.com/pa/Stand/Project%20201803%20Standards%20Efficiency%20Review%20Require/2018-03_SER_FAC-008_Consideration_of_Comments_01192021.pdf.

D. Board of Trustees Adoption

The NERC Board of Trustees adopted proposed Reliability Standard FAC-008-5 on February 4, 2021.[5]

[5] NERC, *Board of Trustees Agenda Package*, Agenda Item 7a. (Project 2018-03 Standards Efficiency Review Retirements (FAC-008-5)) *available at* https://www.nerc.com/gov/bot/Agenda%20highlights%20and%20Mintues%202013/Board_Open_Meeting_Agenda-Feb-4-2021_PUBLIC_ONLY.pdf.

Complete Record of Development

Project 2018-03 Standards Efficiency Review Retirements

Related Files

Status

The 10-day final ballot for **FAC-008-5 Facility Ratings** concluded **8 p.m. Eastern, Thursday, January 28, 2021**. The voting results can be accessed via the link below. The standard will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

Project Scope

The Standard Authorization Request (SAR) drafting team evaluated NERC Reliability Standards using a risk-based approach to identify potential efficiencies through retirement or modification of Reliability Standard Requirements. The drafting team identified potential candidate requirements that are not essential for reliability, could be simplified or consolidated, and could thereby reduce regulatory obligations and/or compliance burden.

The Project 2018-03 standard drafting team (SDT) proposed retiring Requirement R7 and Requirement R8 of FAC-008-3. Proposed FAC-008-4 was approved by final ballot on May 2, 2019 and adopted by the BOT on May 9, 2019. NERC subsequently filed a Petition with FERC on June 7, 2019 for approval of proposed Reliability Standard FAC-008-4. On September 17, 2020, FERC issued an Order approving the retirement of 19 Reliability Standard requirements and remanded proposed FAC-008-4 for further consideration by NERC.

The Project 2018-3 SDT has been recalled to further consider the proposed retirements of Requirement R7 and Requirement R8 of FAC-008.

Standard(s) Affected: FAC-008-3

Standards Efficiency Review Retirements (SER-Retirements)

The SER-Retirements standards drafting team is comprised of a mix of team members with Real-time Operations, Long-term Planning, and Operations Planning expertise to evaluate FAC-008 Requirement R7 and Requirement R8 for retirement.

Draft	Actions	Dates	Results	Consideration of Comments
Final Posting FAC-008-5 **(13)** Clean | **(14)** Redline to Last Posted | **(15)** Redline to Last Approved Implementation Plan **(16)** Clean | **(17)** Redline **Supporting Materials** VRF/VSL Justifications **(18)** Clean | **(19)** Redline	Final Ballot **(20)** Info Vote	01/19/21 - 01/28/21	**(21)** Ballot Results	
(1) FAC-008-4 (Redline) **Initial Posting** **(2)** FAC-008-5 **(3)** Implementation Plan **Supporting Materials** **(4)** Unofficial Comment Form (Word) **(5)** VRF/VSL Justifications	Initial Ballot and Non-binding Poll **(9)** Updated Info **(10)** Info Vote	01/04/21 - 01/13/21	**(11)** Ballot Results **(12)** Non-binding Poll Results	
	Join Ballot Pools	11/30/20 - 12/29/20		
	Comment Period **(6)** Info Submit Comments	11/30/20 - 01/13/21	**(7)** Comments Received	**(8)** Consideration of Comments

A. Introduction

1. **Title:** Facility Ratings

2. **Number:** FAC-008-~~4~~5

3. **Purpose:** To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits.

4. **Applicability:**

   4.1. Transmission Owner

   4.2. Generator Owner

5. **Effective Date:** See Implementation Plan.

B. Requirements and Measures

R1. Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facility(ies) up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up transformer. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

1.1. The documentation shall contain assumptions used to rate the generator and at least one of the following:

- Design or construction information such as design criteria, ratings provided by equipment manufacturers, equipment drawings and/or specifications, engineering analyses, method(s) consistent with industry standards (e.g. ANSI and IEEE), or an established engineering practice that has been verified by testing or engineering analysis.
- Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.

1.2. The documentation shall be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

M1. Each Generator Owner shall have documentation that shows how its Facility Ratings were determined as identified in Requirement 1.

R2. Each Generator Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner that contains all of the following. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

2.1. The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronic Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

2.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R2, Part 2.1 including identification of how each of the following were considered:

2.2.1. Equipment Rating standard(s) used in development of this methodology.

2.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

2.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

2.2.4. Operating limitations.[1]

2.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

2.4. The process by which the Rating of equipment that comprises a Facility is determined.

2.4.1. The scope of equipment addressed shall include, but not be limited to, conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

2.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M2. Each Generator Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 2, Parts 2.1 through 2.4.

R3. Each Transmission Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned Facilities (except for those generating unit Facilities addressed in R1 and R2) that contains all of the following: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

3.1. The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronics Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

[1] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

3.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R3, Part 3.1 including identification of how each of the following were considered:

3.2.1. Equipment Rating standard(s) used in development of this methodology.

3.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

3.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

3.2.4. Operating limitations.[2]

3.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

3.4. The process by which the Rating of equipment that comprises a Facility is determined.

3.4.1. The scope of equipment addressed shall include, but not be limited to, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

3.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M3. Each Transmission Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 3, Parts 3.1 through 3.4.

R4. Reserved.

M4. Reserved.

R5. Reserved.

M5. Reserved.

R6. Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

M6. Each Transmission Owner and Generator Owner shall have evidence to show that its Facility Ratings are consistent with the documentation for determining its Facility Ratings as specified in Requirement R1 or consistent with its Facility Ratings methodology as specified in Requirements R2 and R3 (Requirement R6).

R7. Reserved.

M7. Reserved.

[2] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

R8. ~~Reserved.~~ Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center:

8.2.1. Identity of the existing next most limiting equipment of the Facility

8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

M8. ~~Reserved.~~ Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R8.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority: "Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Compliance Monitoring and Enforcement Processes:

- Self-Certifications
- Spot Checking
- Compliance Audits

- Self-Reporting
- Compliance Violation Investigations
- Complaints

1.3. Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The Generator Owner shall keep its current documentation (for R1) and any modifications to the documentation that were in force since last compliance audit period for Measure M1 and Measure M6.
- The Generator Owner shall keep its current, in force Facility Ratings methodology (for R2) and any modifications to the methodology that were in force since last compliance audit period for Measure M2 and Measure M6.
- The Transmission Owner shall keep its current, in force Facility Ratings methodology (for R3) and any modifications to the methodology that were in force since the last compliance audit for Measure M3 and Measure M6.
- The Transmission Owner and Generator Owner shall keep its current, in force Facility Ratings and any changes to those ratings for three calendar years for Measure M6.
- The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
- If a Generator Owner or Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant.
- The Compliance Enforcement Authority shall keep the last audit and all subsequent compliance records.

1.4. Compliance Monitoring and Enforcement Program: As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.1.	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.2.	The Generator Owner failed to provide documentation for determining its Facility Ratings.
R2.	The Generator Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology did not address all the components of Requirement R2, Part 2.4. OR The Generator Owner failed to include in its Facility Rating Methodology, three of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in Requirement R2, Part 2.3 OR The Generator Owner failed to include in its Facility Rating Methodology four or more of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R3.	The Transmission Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology did not address either of the following Parts of Requirement R3: • 3.4.1 • 3.4.2 OR The Transmission Owner failed to include in its Facility Rating methodology three of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology failed to recognize a Facility's rating based on the most limiting component rating as required in Requirement R3, Part 3.3 OR The Transmission Owner failed to include in its Facility Rating methodology four or more of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4
R4. Reserved.				
R5. Reserved.				

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R6.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for 5% or less of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 5% or more, but less than up to (and including) 10% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 10% up to (and including) 15% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than15% of its solely owned and jointly owned Facilities. (R6)
R7. Reserved.				
R8. ~~Reserved.~~	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to and including 15 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 100%,	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 95%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 90%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 85% of the required Rating information to all of the

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	but not less than or equal to 95% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but the information was provided up to and including 15 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 100%, but not less than or equal to 95% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 90% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more 15 calendar days but less than or equal to 25 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 95%, but not less than or equal to 90% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 85% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 25 calendar days but less than or equal to 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 90%, but no less than or equal to 85% of the required Rating information to the requesting entity. (R8, Part 8.2)	requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 85 % of the required Rating information to the requesting entity. (R8, Part 8.2) OR The responsible entity failed to provide its Rating information to the requesting entity. (R8, Part 8.1)

D. Regional Variances

None.

E. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	Feb 7, 2006	Approved by Board of Trustees	New
1	Mar 16, 2007	Approved by FERC	New
2	May 12, 2010	Approved by Board of Trustees	Complete Revision, merging FAC_008-1 and FAC-009-1 under Project 2009-06 and address directives from Order 693
3	May 24, 2011	Addition of Requirement R8	Project 2009-06 Expansion to address third directive from Order 693
3	May 24, 2011	Adopted by NERC Board of Trustees	
3	November 17, 2011	FERC Order issued approving FAC-008-3	
3	May 17, 2012	FERC Order issued directing the VRF for Requirement R2 be changed from "Lower" to "Medium"	
3	February 7, 2013	R4 and R5 and associated elements approved by NERC Board of Trustees for retirement as part of the Paragraph 81 project (Project 2013-02) pending applicable regulatory approval.	
3	November 21, 2013	R4 and R5 and associated elements approved by FERC for retirement as part of the Paragraph 81 project (Project 2013-02)	
4	~~TBD~~May 9, 2020	R7 and R8 and associated elements adopted by NERC Board of Trustees for retirement as part of Project 2018-03 Standards Efficiency Review Retirements.~~Adopted by NERC Board of Trustees~~	~~R7 and R8 and associated elements approved by NERC Board of Trustees for retirement as part of Project 2018-03 Standard Efficiency Review Retirements~~
4	September 17, 2020	Remanded by FERC (Order No. 873).	Withdrawn

Version	Date	Action	Change Tracking
5	TBD	Adopted by NERC Board of Trustees	Requirement R8 and associated elements restored in response to FERC Order No. 873.

A. Introduction

1. **Title:** Facility Ratings

2. **Number:** FAC-008-5

3. **Purpose:** To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits.

4. **Applicability:**

   4.1. Transmission Owner

   4.2. Generator Owner

5. **Effective Date:** See Implementation Plan.

B. Requirements and Measures

R1. Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facility(ies) up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up transformer. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

1.1. The documentation shall contain assumptions used to rate the generator and at least one of the following:

- Design or construction information such as design criteria, ratings provided by equipment manufacturers, equipment drawings and/or specifications, engineering analyses, method(s) consistent with industry standards (e.g. ANSI and IEEE), or an established engineering practice that has been verified by testing or engineering analysis.
- Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.

1.2. The documentation shall be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

M1. Each Generator Owner shall have documentation that shows how its Facility Ratings were determined as identified in Requirement 1.

R2. Each Generator Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner that contains all of the following. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

2.1. The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronic Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

2.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R2, Part 2.1 including identification of how each of the following were considered:

2.2.1. Equipment Rating standard(s) used in development of this methodology.

2.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

2.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

2.2.4. Operating limitations.[1]

2.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

2.4. The process by which the Rating of equipment that comprises a Facility is determined.

2.4.1. The scope of equipment addressed shall include, but not be limited to, conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

2.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M2. Each Generator Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 2, Parts 2.1 through 2.4.

R3. Each Transmission Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned Facilities (except for those generating unit Facilities addressed in R1 and R2) that contains all of the following: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

3.1. The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronics Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

[1] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

3.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R3, Part 3.1 including identification of how each of the following were considered:

3.2.1. Equipment Rating standard(s) used in development of this methodology.

3.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

3.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

3.2.4. Operating limitations.[2]

3.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

3.4. The process by which the Rating of equipment that comprises a Facility is determined.

3.4.1. The scope of equipment addressed shall include, but not be limited to, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

3.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M3. Each Transmission Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 3, Parts 3.1 through 3.4.

R4. Reserved.

M4. Reserved.

R5. Reserved.

M5. Reserved.

R6. Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

M6. Each Transmission Owner and Generator Owner shall have evidence to show that its Facility Ratings are consistent with the documentation for determining its Facility Ratings as specified in Requirement R1 or consistent with its Facility Ratings methodology as specified in Requirements R2 and R3 (Requirement R6).

R7. Reserved.

M7. Reserved.

[2] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

R8. Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center:

8.2.1. Identity of the existing next most limiting equipment of the Facility

8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

M8. Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R8.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority: "Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Compliance Monitoring and Enforcement Processes:

- Self-Certifications
- Spot Checking
- Compliance Audits
- Self-Reporting

- Compliance Violation Investigations
- Complaints

1.3. Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The Generator Owner shall keep its current documentation (for R1) and any modifications to the documentation that were in force since last compliance audit period for Measure M1 and Measure M6.
- The Generator Owner shall keep its current, in force Facility Ratings methodology (for R2) and any modifications to the methodology that were in force since last compliance audit period for Measure M2 and Measure M6.
- The Transmission Owner shall keep its current, in force Facility Ratings methodology (for R3) and any modifications to the methodology that were in force since the last compliance audit for Measure M3 and Measure M6.
- The Transmission Owner and Generator Owner shall keep its current, in force Facility Ratings and any changes to those ratings for three calendar years for Measure M6.
- The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
- If a Generator Owner or Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant.
- The Compliance Enforcement Authority shall keep the last audit and all subsequent compliance records.

1.4. Compliance Monitoring and Enforcement Program: As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.1.	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.2.	The Generator Owner failed to provide documentation for determining its Facility Ratings.
R2.	The Generator Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology did not address all the components of Requirement R2, Part 2.4. OR The Generator Owner failed to include in its Facility Rating Methodology, three of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in Requirement R2, Part 2.3 OR The Generator Owner failed to include in its Facility Rating Methodology four or more of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R3.	The Transmission Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology did not address either of the following Parts of Requirement R3: • 3.4.1 • 3.4.2 OR The Transmission Owner failed to include in its Facility Rating methodology three of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology failed to recognize a Facility's rating based on the most limiting component rating as required in Requirement R3, Part 3.3 OR The Transmission Owner failed to include in its Facility Rating methodology four or more of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4
R4. Reserved.				
R5. Reserved.				

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R6.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for 5% or less of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 5% or more, but less than up to (and including) 10% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 10% up to (and including) 15% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than15% of its solely owned and jointly owned Facilities. (R6)
R7. Reserved.				
R8.	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to and including 15 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 100%,	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 95%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 90%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 85% of the required Rating information to all of the

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	but not less than or equal to 95% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but the information was provided up to and including 15 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 100%, but not less than or equal to 95% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 90% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more 15 calendar days but less than or equal to 25 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 95%, but not less than or equal to 90% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 85% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 25 calendar days but less than or equal to 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 90%, but no less than or equal to 85% of the required Rating information to the requesting entity. (R8, Part 8.2)	requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 85 % of the required Rating information to the requesting entity. (R8, Part 8.2) OR The responsible entity failed to provide its Rating information to the requesting entity. (R8, Part 8.1)

D. Regional Variances

None.

E. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	Feb 7, 2006	Approved by Board of Trustees	New
1	Mar 16, 2007	Approved by FERC	New
2	May 12, 2010	Approved by Board of Trustees	Complete Revision, merging FAC_008-1 and FAC-009-1 under Project 2009-06 and address directives from Order 693
3	May 24, 2011	Addition of Requirement R8	Project 2009-06 Expansion to address third directive from Order 693
3	May 24, 2011	Adopted by NERC Board of Trustees	
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3	November 21, 2013	R4 and R5 and associated elements approved by FERC for retirement as part of the Paragraph 81 project (Project 2013-02)	
4	May 9, 2020	R7 and R8 and associated elements adopted by NERC Board of Trustees for retirement as part of Project 2018-03 Standards Efficiency Review Retirements.	
4	September 17, 2020	Remanded by FERC (Order No. 873).	Withdrawn
5	TBD	Adopted by NERC Board of Trustees	Requirement R8 and associated elements restored in response

Version	Date	Action	Change Tracking
			to FERC Order No. 873.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Implementation Plan

Project 2018-03 Standards Efficiency Review Retirements
Reliability Standard FAC-008-5

Applicable Standard(s)

- FAC-008-5 – Facility Ratings

Requested Retirement(s)

- FAC-008-3 – Facility Ratings

Applicable Entities

- Transmission Owner
- Generator Owner

Background

In 2017, NERC initiated the Standards Efficiency Review (SER). The scope of this project was to use a risk-based approach to identify potential efficiencies through retirement of Reliability Standard requirements. Following the completion of the first phase of work, the SER standard drafting team (SDT) submitted a Standards Authorization Request (SAR) to the NERC Standards Committee, which the Standards Committee accepted in August 2018.

Project 2018-03 Standards Efficiency Review Retirements was initiated to consider and implement the recommendations for Reliability Standard retirements contained in the SAR.
Among other things, the SER SDT proposed retiring Requirements R7 and R8 in Reliability Standard FAC-008-3 as redundant and not needed for reliability. Proposed Reliability Standard FAC-008-4 passed final ballot on May 2, 2019; was adopted by the Board of Trustees on May 9, 2019; and was filed with the Federal Energy Regulatory Commission (FERC) on June 7, 2019 for approval.

On September 17, 2020, the Federal Regulatory Commission (FERC) issued Order No. 873.[1] With respect to proposed Reliability Standard FAC-008-4, FERC determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). FERC remanded proposed Reliability Standard FAC-008-4 to NERC for further consideration.

[1] Order No. 873, *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review*, 172 FERC ¶ 61,225 (2020), https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20on%20SER%20Retirements.pdf.

Following the FERC remand, NERC submitted a notice to the remaining applicable governmental authorities requesting that FAC-008-4 be withdrawn in their respective jurisdictions.

Proposed Reliability Standard FAC-008-5 would retire Requirement R7 of currently effective Reliability Standard FAC-008-3.

General Considerations

For Reliability Standard FAC-008-5– Facility Ratings, the standard will become effective on the first day of the first calendar quarter that is three (3) months after applicable regulatory approval. This implementation timeframe reflects consideration that entities may need time to update their internal systems and documentation to reflect the new standard version numbers.

Effective Date

Reliability Standard FAC-008-5– Facility Ratings

Where approval by an applicable governmental authority is required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Retirement Date

Reliability Standard FAC-008-3 – Facility Ratings

Reliability Standard FAC-008-3 shall be retired immediately prior to the effective date of the revised standard in the particular jurisdiction in which the revised standard is becoming effective.

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NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Unofficial Comment Form

Project 2018-03 Standards Efficiency Review Retirements

Do not use this form for submitting comments. Use the Standards Balloting and Commenting System (SBS) to submit comments on **FAC-008-5 – Facility Ratings** by **8 p.m. Eastern, Wednesday, January 13, 2021.**

Additional information is available on the project page. If you have questions, contact Standards Developer, Laura Anderson (via email), or at 404-446-9671.

Background Information

In 2017, NERC initiated the Standards Efficiency Review (SER). The scope of this project was to use a risk-based approach to identify potential efficiencies through retirement of Reliability Standard Requirements. Following the completion of the first phase of work, the SER standard drafting team (SDT) submitted a SAR to the NERC Standards Committee, which the Standards Committee accepted in August 2018. Project 2018-03 Standards Efficiency Review Retirements was initiated to consider and implement the recommendations for Reliability Standard retirements contained in the SAR.

Among other things, the SER SDT proposed retiring Requirements R7 and R8 in Reliability Standard FAC-008-3 as redundant and not needed for reliability. Proposed Reliability Standard FAC-008-4 passed final ballot at 95.74 percent on May 2, 2019; was adopted by the Board of Trustees on May 9, 2019; and was filed with the Federal Energy Regulatory Commission (FERC) on June 7, 2019 for approval.

On September 17, 2020, FERC issued Order No. 873. [1] With respect to proposed Reliability Standard FAC-008-4, FERC determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). FERC remanded proposed Reliability Standard FAC-008-4 to NERC for further consideration.

The SER SDT has met, considered the issues contained in FERC's Order No. 873, and has developed proposed Reliability Standard FAC-008-5, which would retain Requirement R8 and retire Requirement R7 of FAC-008-3.

[1] Order No. 873, *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards under the NERC Standards Efficiency Review*, 172 FERC ¶ 61,225 (2020), https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20on%20SER%20Retirements.pdf.

Questions

1. The SDT is proposing to retire Requirements R7 from FAC-008-3, as indicated in previously proposed FAC-008-4, and retain Requirement R8. Do you agree with the SDT's proposal to retire Requirement R7? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

   ☐ Yes
   ☐ No

   Comments:

2. Please provide any additional comments for the SDT to consider that have not already been provided in the questions above.

   Comments:

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Violation Risk Factor and Violation Severity Level Justifications

Project 2018-03 Standards Efficiency Review Retirements

This document provides the standard drafting team's (SDT's) justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in proposed Reliability Standard FAC-008-5. Each requirement is assigned a VRF and a VSL. These elements support the determination of an initial value range for the Base Penalty Amount regarding violations of requirements in FERC-approved Reliability Standards, as defined in the Electric Reliability Organizations (ERO) Sanction Guidelines. The SDT applied the following NERC criteria and FERC Guidelines when developing the VRFs and VSLs for the requirements.

NERC Criteria for Violation Risk Factors

High Risk Requirement

A requirement that, if violated, could directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

Medium Risk Requirement

A requirement that, if violated, could directly affect the electrical state or the capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System. However, violation of a medium risk requirement is unlikely to lead to Bulk Electric System instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to Bulk Electric System instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

Lower Risk Requirement
A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

FERC Guidelines for Violation Risk Factors

Guideline (1) – Consistency with the Conclusions of the Final Blackout Report

FERC seeks to ensure that VRFs assigned to Requirements of Reliability Standards in these identified areas appropriately reflect their historical critical impact on the reliability of the Bulk-Power System. In the VSL Order, FERC listed critical areas (from the Final Blackout Report) where violations could severely affect the reliability of the Bulk-Power System:

- Emergency operations
- Vegetation management
- Operator personnel training
- Protection systems and their coordination
- Operating tools and backup facilities
- Reactive power and voltage control
- System modeling and data exchange
- Communication protocol and facilities
- Requirements to determine equipment ratings
- Synchronized data recorders
- Clearer criteria for operationally critical facilities
- Appropriate use of transmission loading relief.

Guideline (2) – Consistency within a Reliability Standard

FERC expects a rational connection between the sub-Requirement VRF assignments and the main Requirement VRF assignment.

Guideline (3) – Consistency among Reliability Standards

FERC expects the assignment of VRFs corresponding to Requirements that address similar reliability goals in different Reliability Standards would be treated comparably.

Guideline (4) – Consistency with NERC's Definition of the Violation Risk Factor Level

Guideline (4) was developed to evaluate whether the assignment of a particular VRF level conforms to NERC's definition of that risk level.

Guideline (5) – Treatment of Requirements that Co-mingle More Than One Obligation

Where a single Requirement co-mingles a higher risk reliability objective and a lesser risk reliability objective, the VRF assignment for such Requirements must not be watered down to reflect the lower risk level associated with the less important objective of the Reliability Standard.

NERC Criteria for Violation Severity Levels

VSLs define the degree to which compliance with a requirement was not achieved. Each requirement must have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs.

VSLs should be based on NERC's overarching criteria shown in the table below:

Lower VSL	Moderate VSL	High VSL	Severe VSL
The performance or product measured almost meets the full intent of the requirement.	The performance or product measured meets the majority of the intent of the requirement.	The performance or product measured does not meet the majority of the intent of the requirement, but does meet some of the intent.	The performance or product measured does not substantively meet the intent of the requirement.

FERC Order of Violation Severity Levels

The FERC VSL guidelines are presented below, followed by an analysis of whether the VSLs proposed for each requirement in the standard meet the FERC Guidelines for assessing VSLs:

Guideline (1) – Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance

Compare the VSLs to any prior levels of non-compliance and avoid significant changes that may encourage a lower level of compliance than was required when levels of non-compliance were used.

Guideline (2) – Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties

A violation of a "binary" type requirement must be a "Severe" VSL.
Do not use ambiguous terms such as "minor" and "significant" to describe noncompliant performance.

Guideline (3) – Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement

VSLs should not expand on what is required in the requirement.

Guideline (4) – Violation Severity Level Assignment Should Be Based on a Single Violation, Not on a Cumulative Number of Violations

Unless otherwise stated in the requirement, each instance of non-compliance with a requirement is a separate violation. Section 4 of the Sanction Guidelines states that assessing penalties on a per violation per day basis is the "default" for penalty calculations.

VRF Justification for FAC-008-5, Requirement R1

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R2

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R3

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R6

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R8

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R1

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R2

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R3

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R6

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R8

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

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Standards Announcement

Project 2018-03 Standards Efficiency Review Retirements

Formal Comment Period Open through January 13, 2021
Ballot Pools Forming through December 29, 2020

Now Available

A 45-day comment period for **FAC-008-5 – Facility Ratings** is open through **8 p.m. Eastern, Wednesday, January 13, 2021**.

Commenting

Use the Standards Balloting and Commenting System (SBS) to submit comments. If you experience issues using the SBS, contact Wendy Muller. An unofficial Word version of the comment form is posted on the project page.

Ballot Pools

Ballot pools are being formed through **8 p.m. Eastern, Tuesday, December 29, 2020.** Registered Ballot Body members can join the ballot pools here.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

The initial ballot for the standard and non-binding poll of the associated Violation Risk Factors and Violation Severity Levels, will be conducted **January 4-13, 2021.**

For information on the Standards Development Process, refer to the Standard Processes Manual**.**

For more information or assistance, contact Standards Developer, Laura Anderson (via email) or at (404) 446-9671.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

Comment Report

Project Name:	2018-03 Standards Efficiency Review Retirements | FAC-008-5
Comment Period Start Date:	11/30/2020
Comment Period End Date:	1/13/2021
Associated Ballots:	2018-03 Standards Efficiency Review Retirements FAC-008-5 IN 1 ST

There were 45 sets of responses, including comments from approximately 107 different people from approximately 81 companies representing 10 of the Industry Segments as shown in the table on the following pages.

Questions

1. The SDT is proposing to retire Requirements R7 from FAC-008-3, as indicated in previously proposed FAC-008-4, and retain Requirement R8. Do you agree with the SDT's proposal to retire Requirement R7? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

2. If desired, please provide additional comments for the SDT to consider.

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
MRO	Dana Klem	1,2,3,4,5,6	MRO	MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administration	1,6	MRO
					Andy Crooks	SaskPower Corporation	1	MRO
					Bryan Sherrow	Kansas City Board of Public Utilities	1	MRO
					Bobbi Welch	Omaha Public Power District	1,3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Bobbi Welch	Midcontinent ISO	2	MRO
					Douglas Webb	Kansas City Power & Light	1,3,5,6	MRO
					Fred Meyer	Algonquin Power Co.	1	MRO
					John Chang	Manitoba Hydro	1,3,6	MRO
					James Williams	Southwest Power Pool, Inc.	2	MRO
					Jamie Monette	Minnesota Power / ALLETE	1	MRO
					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Sing Tay	Oklahoma Gas & Electric	1,3,5,6	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO

					Troy Brumfield	American Transmission Company	1	MRO
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC,Texas RE	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Ann Carey	FirstEnergy - FirstEnergy Solutions	6	RF
					Mark Garza	FirstEnergy-FirstEnergy	4	RF
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC

Helen Lainis	IESO	2	NPCC
David Kiguel	Independent	7	NPCC
Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
Nick Kowalczyk	Orange and Rockland	1	NPCC
Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
Salvatore Spagnolo	New York Power Authority	1	NPCC
Shivaz Chopra	New York Power Authority	5	NPCC
Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC
Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
Cristhian Godoy	Con Ed - Consolidated Edison Co. of New York	6	NPCC
Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
Nurul Abser	NB Power Corporation	1	NPCC
Randy MacDonald	NB Power Corporation	2	NPCC

					Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC
					Vijay Puran	NYSPS	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Jim Grant	NYISO	2	NPCC
					John Pearson	ISONE	2	NPCC
					John Hastings	National Grid USA	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
					Chantal Mazza	Hydro-Quebec	2	NPCC

1. The SDT is proposing to retire Requirements R7 from FAC-008-3, as indicated in previously proposed FAC-008-4, and retain Requirement R8. Do you agree with the SDT's proposal to retire Requirement R7? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer	No
Document Name	

Comment

Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter.

Consequently, I am balloting to retire what we can agree to retire.

Likes 0	
Dislikes 0	

Response

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF

Answer	Yes
Document Name	

Comment

The NSRF agrees with the SER Retirements.

Likes 0	
Dislikes 0	

Response

Michael Whitney - Northern California Power Agency - 3,4,5,6

Answer	Yes
Document Name	

Comment

Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter. Consequently, I am balloting to retire what we can agree to retire.	
Likes 0	
Dislikes 0	
Response	
Dennis Sismaet - Northern California Power Agency - 6	
Answer	Yes
Document Name	
Comment	
Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter. Consequently, I am balloting to retire what we can agree to retire	
Likes 0	
Dislikes 0	
Response	
Truong Le - Truong Le On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 5, 3; Chris Gowder, Florida Municipal Power Agency, 6, 4, 5, 3; Dale Ray, Florida Municipal Power Agency, 6, 4, 5, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 5, 3; - Truong Le	
Answer	Yes
Document Name	
Comment	
Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter.	
Likes 0	
Dislikes 0	
Response	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	

Comment	
N/A.	
Likes 0	
Dislikes 0	
Response	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the retirement of Requirement R7 and retention of Requirement R8.	
Likes 0	
Dislikes 0	
Response	
Daniel Gacek - Exelon - 1	
Answer	Yes
Document Name	
Comment	

Exelon concurs with the EEI comment, supporting the retirement of Requirement R7 and the retention of Requirement R8.

Submitted on behalf of Exelon, Segments 1, 3, 5, 6

Likes 0	
Dislikes 0	

Response

W. Dwayne Preston - Austin Energy - 3

Answer	Yes
Document Name	

Comment

Austin Energy agrees with the comments submitted by Platter River Power.
However, Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.

Likes 1	Platte River Power Authority, 5, Archie Tyson
Dislikes 0	

Response

Jun Hua - Austin Energy - 4

Answer	Yes
Document Name	

Comment

Austin Energy agrees with the comments submitted by Platter River Power.

However, Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.

Likes 1	Platte River Power Authority, 5, Archie Tyson
Dislikes 0	

Response

Michael Dillard - Austin Energy - 5	
Answer	Yes
Document Name	
Comment	

Austin Energy agrees with the comments submitted by Platter River Power.

However, Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.

Likes 1	Platte River Power Authority, 5, Archie Tyson
Dislikes 0	

Response

Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Yes
Document Name	
Comment	

No comments

Likes 0	
Dislikes 0	

Response

Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	Yes
Document Name	
Comment	

No additional comments.

Likes 0	
Dislikes 0	

Response

Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	Yes
Document Name	
Comment	
MISO supports the retirement of Requirement R7 and the retention of Requirement R8.	
Likes 0	
Dislikes 0	
Response	
Colleen Campbell - AES - Indianapolis Power and Light Co. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kjersti Drott - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Kim Thomas - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Bruce Reimer - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jeremy Lorigan - Seminole Electric Cooperative, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tammy Porter - Tammy Porter On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tammy Porter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Tyson Archie - Platte River Power Authority - 5	

Answer	Yes
Document Name	
Comment	
Likes 2	Platte River Power Authority, 1, Thompson Matt; Platte River Power Authority, 3, Kiess Wade
Dislikes 0	
Response	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Joe Tarantino - Joe Tarantino On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Foung Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Joe Tarantino	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jenjira Knernschield - Old Dominion Electric Coop. - 3	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Andrea Barclay - Georgia System Operations Corporation - 3,4	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Dania Colon - Orlando Utilities Commission - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Maurice Paulk - Cleco Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Erin Green - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Paul Mehlhaff - Sunflower Electric Power Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE recommends removing “subject to Requirement R2” in Requirement R8. It should be clear that all Generator Owners (GO) shall provide Facility Ratings data when the Reliability Coordinators (RC), Planning Coordinators (PC), Transmission Planners (TP), Transmission Owners (TO), and Transmission Operators (TOP) identify a need for the data. Since Requirement R2 is already applicable to a large majority of GOs, removing the verbiage in Requirement R8, would eliminate the need for GOs to evaluate how a request for Facility Ratings data fits into the applicability specified within Requirement R8.	
Likes 0	
Dislikes 0	
Response	
Andrew Gallo - Austin Energy - 6	
Answer	
Document Name	
Comment	
Austin Energy agrees with the comments submitted by Platter River Power. Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so it is not an opening for expansion by auditors to request "carte blanche" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.	
Likes 0	
Dislikes 0	

Response

2. If desired, please provide additional comments for the SDT to consider.

Bobbi Welch - Midcontinent ISO, Inc. - 2

Answer	
Document Name	

Comment

None

Likes 0	
Dislikes 0	

Response

Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike

Answer	
Document Name	

Comment

Tacoma Power supports the comments submitted by Platte River Power Authority with respect to modifying the language in FAC-008 R8 if retirement of the Requirement is not feasible.

Likes 0	
Dislikes 0	

Response

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee

Answer	
Document Name	

Comment

We recommend that FAC-008 be prioritized for another revision (new project) to act on the potential revisions/corrections that were identified in Project 2017-03 FAC-008-3 Periodic Review.

Likes 0	
Dislikes 0	

Response
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4
Answer	
Document Name	
Comment
No additional comments.
Likes 0	
Dislikes 0	
Response
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb
Answer	
Document Name	
Comment
None.
Likes 0	
Dislikes 0	
Response
Joe Tarantino - Joe Tarantino On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Foung Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Joe Tarantino
Answer	
Document Name	
Comment
SMUD agrees with the comments submitted by Platter River Power. However, SMUD would like the SDT to consider providing clarificaiton to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.

Likes 2	Austin Energy, 3, Preston W. Dwayne; Platte River Power Authority, 5, Archie Tyson
Dislikes 0	

Response

Tyson Archie - Platte River Power Authority - 5

Answer	
Document Name	

Comment

Platte River agrees with the SDT's recommendation to retire Requirement R7 from FAC-008-3 in response to FERC Oder No. 873. Platte River would like R8 to be retired in its entirety as we believe sufficient technical justification was provided for its retirement by NERC in their June 7, 2019 petition. If R8 cannot be retired in its entirety, we recommend revising R8 as detailed below.

Platte River recommends removing item 2) Total Transfer Capability (TTC) from Requirement 8.2, as TTC is primarily used for commercial operations not reliability. As stated in NERC's June 7, 2019 petition: "Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to SOLs and IROLs. If a scheduled interchange would violate SOLs or IROLs, the real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits." This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry.

Additionally, Platte River agrees with NERC's justification for the proposed retirement of the 56 MOD A Reliability Standards and their associated requirements which includes the rationale that these standards are commercial in nature. If/when the MOD A reliability standards are retired, determining TTC will no longer be required by any NERC reliability standard. Removing TTC at this time would be forward looking and beneficial as to not have FAC-008-5 referencing an out of date term.

Platte River recommends removing or, at a minimum, defining 3) an impediment to generator deliverability. This term is not defined in the NERC Glossary of Terms, and to date, ERO-endorsed guidance is not available for entities to reference for defining generator deliverability. Due to the differences in size and complexity of registered entities and individual generating units, generator deliverability can vary widely. This creates inconsistency and confusion for reporting entities as well as regional entity staff.

Platte River recommends removing item 4) An impediment to service to a major load center from Requirement 8.2. Major load center is not defined in the NERC Glossary of Terms, and to date, ERO-endorsed guidance is not available for entities to reference for defining a major-load center. Due to the differences in size and complexity of registered entities, a major load center can vary widely. This creates inconsistency and confusion for reporting entities as well as regional entity staff.

Therefore, Platte River would like the SDT to consider the following proposed changes to Requirement R8, sub requirement 8.2.

Proposed changes to Requirement R8 of FAC-008-5:

R8: Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing an Interconnection Reliability Operating Limit (IROL).

8.2.1. Identity of the existing next most limiting equipment of the Facility

8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

In conclusion, Platte River believes the operation of the Bulk Electric System (BES) is rooted in determining and operating within SOL's and IROL's. Requirement 8.1 addresses the sharing of SOL's, and Platte River's recommendation for Requirement 8.2 addresses the critical nature of IROL's. Requirement 8.2, as currently written, strays from these two well-known and widely used terms.

Likes 5	Tarantino Joe On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Platte River Power Authority, 1, Thompson Matt; Platte River Power Authority, 3, Kiess Wade; Austin Energy, 3, Preston W. Dwayne; Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merre
Dislikes 0	

Response

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer	
Document Name	

Comment

None.

Likes 0	
Dislikes 0	

Response

Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	
Document Name	

Comment

As in its previous NOPR response, BPA agrees with FERC's assertion that Requirement R8's direction to communicate with Transmission Owners is not found in MOD-032, TOP-001, and/or IRO-010, therefore is a provision to be retained in FAC-008. BPA does, however, agree with the comments submitted by Platte River Power Authority and recommends that Requirement R8 be revised to add clarity and reduce undue burden on reporting entities.

Likes 0	
Dislikes 0	

Response

Leonard Kula - Independent Electricity System Operator - 2

Answer	
Document Name	

Comment

N/A.

Likes 0	
Dislikes 0	

Response

Tammy Porter - Tammy Porter On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tammy Porter

Answer	
Document Name	

Comment

N/A

Likes 0	
Dislikes 0	

Response

Richard Jackson - U.S. Bureau of Reclamation - 1

Answer	
Document Name	

Comment

Since R8 will not be retired despite industry support, Reclamation recommends the drafting team seek to simplify R8 as a means of addressing industry opinion on its lack of value. Revising R8 could eliminate the difficulties of interpreting this requirement by narrowing the focus to address only the portions described in FERC's rationale for rejecting its retirement. Reclamation recommends the language of R8 be simplified to require TOs and GOs subject to R2 to identify the most limiting Element and second most limiting Element for each solely or jointly owned Facility.

Likes 0	
Dislikes 0	

Response

Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter

Answer	
Document Name	

Comment

N/A

Likes 0	
Dislikes 0	

Response

Jeremy Lorigan - Seminole Electric Cooperative, Inc. - 3

Answer	
Document Name	

Comment

R8 limits the provision of information from the TO (and applicable GO) to ONLY "***its associated*** RC, PC, TP, TO, and TOP" and does not have any provision for ***adjacent*** RCs, PCs, TPs, TOs, or TOPs to request similar information. I would be inclined to include language that adjacent entities can request this information which would be in-line with what FERC has issues in its NOPR on 11/19/2020 on "Managing Transmission Line Ratings."

Also, I do disagree in part with the VSL's for R8 in that there is no quantitative way to measure whether an entity only provide "85%" of the information associated with a facility rating vs. "90%" and vs. "87%". I agree with the quantitative measure on whether the entity provided it within the 30 calendar days or within the agreed to time-frame.

Likes 0	
Dislikes 0	

Response

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	
Document Name	

Comment

Texas RE noticed an apparent redundancy in the Severe VSL language. The proposed Severe VSL language indicates that entities providing less than 85% of the information required under FAC-008-5, R8 Part 8.1 commit a “Severe” level violation. Correspondingly, the final proposed Severe VSL category indicates that an entity’s complete failure to provide rating information required pursuant to FAC-008-5, R8 Part 8.1 also constitutes a “Severe” level violation. From Texas RE’s perspective, because an entity has already committed a “Severe” violation when it submits less than 85% of the information required under FAC-008-5, R8 Part 8.1, the additional language in the final section addressing a complete failure is wholly subsumed within the 85% or less provision. As such, Texas RE recommends its removal.

Texas RE also noticed a space between 85 and % in the second to last sentence in the Severe VSL section.

Likes 0	
Dislikes 0	

Response

Kim Thomas - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF, Group Name Duke Energy

Answer	
Document Name	

Comment

None.

Likes 0	
Dislikes 0	

Response

Dennis Sismaet - Northern California Power Agency - 6

Answer	
Document Name	

Comment

In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process.

Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be Version 4 not Version 5. To my knowledge FERC did not approve the prior proposed V4. See item section 39 at link Federal Register :: Electric Reliability Organization Proposal To Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review

Likes 0	
Dislikes 0	

Response

Michael Whitney - Northern California Power Agency - 3,4,5,6

Answer	
Document Name	

Comment

In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process.

Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be Version 4 not Version 5. To my knowledge FERC did not approve the prior proposed V4. See item section 39 at link Federal Register :: Electric Reliability Organization Proposal To Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review

Likes 0	
Dislikes 0	

Response

Marty Hostler - Northern California Power Agency - 3,4,5,6

Answer	
Document Name	

Comment

In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process.

Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be V4. To my knowledge FERC did not approve the prior proposed V4.

Likes 0	
Dislikes 0	

Response
Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF
Answer	
Document Name	
Comment
None
Likes 0	
Dislikes 0	
Response
Daniela Atanasovski - APS - Arizona Public Service Co. - 1
Answer	
Document Name	
Comment
None
Likes 0	
Dislikes 0	
Response

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Consideration of Comments

Project Name:	2018-03 Standards Efficiency Review Retirements | FAC-008-5
Comment Period Start Date:	11/30/2020
Comment Period End Date:	1/13/2021
Associated Ballot:	2018-03 Standards Efficiency Review Retirements FAC-008-5 IN 1 ST

There were 45 sets of responses, including comments from approximately 107 different people from approximately 81 companies representing 10 of the Industry Segments as shown in the table on the following pages.

All comments submitted can be reviewed in their original format on the project page.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact Senior Director of Engineering and Standards Howard Gugel (via email) or at (404) 446-9693.

Questions

1. The SDT is proposing to retire Requirements R7 from FAC-008-3, as indicated in previously proposed FAC-008-4, and retain Requirement R8. Do you agree with the SDT's proposal to retire Requirement R7? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

Summary Response:

Proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the Standard Authorization Request (SAR) this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

2. If desired, please provide additional comments for the SDT to consider.

Summary Response:

Proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 or its related

VSL's would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

The retirement being proposed is a retirement to FAC-008-3. FAC-008-4 was remanded, but had gone through the development process so a new version number needed to be created for this development. It is, however a retirement to R7 of FAC-008-3. Developing a definition of jointly owned facilities may be better suited for the next Periodic Review team of FAC-008 to consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Since the BOT approved FAC-008-4 to be submitted to FERC for consideration, this revision must necessarily be FAC-008-5.

The Industry Segments are:

1 — Transmission Owners
2 — RTOs, ISOs
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
10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
MRO	Dana Klem	1,2,3,4,5,6	MRO	MRO NSRF	Joseph DePoorter	Madison Gas & Electric	3,4,5,6	MRO
					Larry Heckert	Alliant Energy	4	MRO
					Michael Brytowski	Great River Energy	1,3,5,6	MRO
					Jodi Jensen	Western Area Power Administration	1,6	MRO
					Andy Crooks	SaskPower Corporation	1	MRO
					Bryan Sherrow	Kansas City Board of Public Utilities	1	MRO
					Bobbi Welch	Omaha Public Power District	1,3,5,6	MRO
					Jeremy Voll	Basin Electric Power Cooperative	1	MRO
					Bobbi Welch	Midcontinent ISO	2	MRO
					Douglas Webb	Kansas City Power & Light	1,3,5,6	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Fred Meyer	Algonquin Power Co.	1	MRO
					John Chang	Manitoba Hydro	1,3,6	MRO
					James Williams	Southwest Power Pool, Inc.	2	MRO
					Jamie Monette	Minnesota Power / ALLETE	1	MRO
					Jamison Cawley	Nebraska Public Power	1,3,5	MRO
					Sing Tay	Oklahoma Gas & Electric	1,3,5,6	MRO
					Terry Harbour	MidAmerican Energy	1,3	MRO
					Troy Brumfield	American Transmission Company	1	MRO
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Adrian Raducea	DTE Energy - Detroit Edison Company	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC,Texas RE	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
FirstEnergy - FirstEnergy Corporation	Mark Garza	4		FE Voter	Julie Severino	FirstEnergy - FirstEnergy Corporation	1	RF
					Aaron Ghodooshim	FirstEnergy - FirstEnergy Corporation	3	RF
					Robert Loy	FirstEnergy - FirstEnergy Solutions	5	RF
					Ann Carey	FirstEnergy - FirstEnergy Solutions	6	RF
					Mark Garza	FirstEnergy-FirstEnergy	4	RF
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	NPCC Regional Standards Committee	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Helen Lainis	IESO	2	NPCC
					David Kiguel	Independent	7	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Nick Kowalczyk	Orange and Rockland	1	NPCC
					Joel Charlebois	AESI - Acumen Engineered Solutions	5	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						International Inc.		
					Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Shivaz Chopra	New York Power Authority	5	NPCC
					Deidre Altobell	Con Ed - Consolidated Edison	4	NPCC
					Dermot Smyth	Con Ed - Consolidated Edison Co. of New York	1	NPCC
					Peter Yost	Con Ed - Consolidated Edison Co. of New York	3	NPCC
					Cristhian Godoy	Con Ed - Consolidated	6	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Edison Co. of New York		
					Sean Bodkin	Dominion - Dominion Resources, Inc.	6	NPCC
					Nurul Abser	NB Power Corporation	1	NPCC
					Randy MacDonald	NB Power Corporation	2	NPCC
					Michael Ridolfino	Central Hudson Gas and Electric	1	NPCC
					Vijay Puran	NYSPS	6	NPCC
					ALAN ADAMSON	New York State Reliability Council	10	NPCC
					Sean Cavote	PSEG - Public Service Electric and Gas Co.	1	NPCC
					Brian Robinson	Utility Services	5	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Quintin Lee	Eversource Energy	1	NPCC
					Jim Grant	NYISO	2	NPCC
					John Pearson	ISONE	2	NPCC
					John Hastings	National Grid USA	1	NPCC
					Michael Jones	National Grid USA	1	NPCC
					Nicolas Turcotte	Hydro-Qu?bec TransEnergie	1	NPCC
					Chantal Mazza	Hydro-Quebec	2	NPCC

1. *The SDT is proposing to retire Requirements R7 from FAC-008-3, as indicated in previously proposed FAC-008-4, and retain Requirement R8. Do you agree with the SDT's proposal to retire Requirement R7? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.	
Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	No
Document Name	
Comment	
Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter. Consequently, I am balloting to retire what we can agree to retire.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.	
Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	Yes

Document Name	
Comment	
The NSRF agrees with the SER Retirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Michael Whitney - Northern California Power Agency - 3,4,5,6	
Answer	Yes
Document Name	
Comment	
Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter. Consequently, I am balloting to retire what we can agree to retire.	
Likes 0	
Dislikes 0	
Response	
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Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.	
Dennis Sismaet - Northern California Power Agency - 6	
Answer	Yes
Document Name	
Comment	
Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter. Consequently, I am balloting to retire what we can agree to retire	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.	
Truong Le - Truong Le On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 5, 3; Chris Gowder, Florida Municipal Power Agency, 6, 4, 5, 3; Dale Ray, Florida Municipal Power Agency, 6, 4, 5, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 5, 3; - Truong Le	
Answer	Yes
Document Name	

Comment	
Yes, R7 should be retired. R8 should also be retired. However, FERC did not agree to Retire R8 in their last ruling on this matter.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
N/A.	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI supports the retirement of Requirement R7 and retention of Requirement R8.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniel Gacek - Exelon - 1	
Answer	Yes

Document Name	
Comment	
Exelon concurs with the EEI comment, supporting the retirement of Requirement R7 and the retention of Requirement R8. Submitted on behalf of Exelon, Segments 1, 3, 5, 6	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
W. Dwayne Preston - Austin Energy - 3	
Answer	Yes
Document Name	
Comment	
Austin Energy agrees with the comments submitted by Platter River Power. However, Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.	
Likes 1	Platte River Power Authority, 5, Archie Tyson
Dislikes 0	
Response	

Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.	
Jun Hua - Austin Energy - 4	
Answer	Yes
Document Name	
Comment	
Austin Energy agrees with the comments submitted by Platter River Power. However, Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.	
Likes 1	Platte River Power Authority, 5, Archie Tyson
Dislikes 0	
Response	
Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.	
Michael Dillard - Austin Energy - 5	
Answer	Yes
Document Name	
Comment	

Austin Energy agrees with the comments submitted by Platter River Power. However, Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.	
Likes 1	Platte River Power Authority, 5, Archie Tyson
Dislikes 0	
Response	
Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.	
Carl Pineault - Hydro-Qu?bec Production - 5	
Answer	Yes
Document Name	
Comment	
No comments	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	

Answer	Yes
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Bobbi Welch - Midcontinent ISO, Inc. - 2	
Answer	Yes
Document Name	
Comment	
MISO supports the retirement of Requirement R7 and the retention of Requirement R8.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Colleen Campbell - AES - Indianapolis Power and Light Co. - 3	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kjersti Drott - Tri-State G and T Association, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kim Thomas - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Bruce Reimer - Manitoba Hydro - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jeremy Lorigan - Seminole Electric Cooperative, Inc. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Tammy Porter - Tammy Porter On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tammy Porter	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Tyson Archie - Platte River Power Authority - 5	
Answer	Yes

Document Name	
Comment	
Likes 2	Platte River Power Authority, 1, Thompson Matt; Platte River Power Authority, 3, Kiess Wade
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - MRO,WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Joe Tarantino - Joe Tarantino On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Foung Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Joe Tarantino	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Jenjira Knernschield - Old Dominion Electric Coop. - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
David Jendras - Ameren - Ameren Services - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Andrea Barclay - Georgia System Operations Corporation - 3,4	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Dania Colon - Orlando Utilities Commission - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maurice Paulk - Cleco Corporation - 3	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Erin Green - Western Area Power Administration - 1,6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Jennifer Bray - Arizona Electric Power Cooperative, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Paul Mehlhaff - Sunflower Electric Power Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	

Document Name	
Comment	
Texas RE recommends removing “subject to Requirement R2” in Requirement R8. It should be clear that all Generator Owners (GO) shall provide Facility Ratings data when the Reliability Coordinators (RC), Planning Coordinators (PC), Transmission Planners (TP), Transmission Owners (TO), and Transmission Operators (TOP) identify a need for the data. Since Requirement R2 is already applicable to a large majority of GOs, removing the verbiage in Requirement R8, would eliminate the need for GOs to evaluate how a request for Facility Ratings data fits into the applicability specified within Requirement R8.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Modification for Requirement R8 may be better suited for a future Periodic Review team of FAC-008 to consider.	
Andrew Gallo - Austin Energy - 6	
Answer	
Document Name	
Comment	
Austin Energy agrees with the comments submitted by Platter River Power. Austin Energy would like the SDT to consider providing clarification to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so it is not an opening for expansion by auditors to request "carte blanche" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.	
Likes 0	

Dislikes 0	

Response
Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.

2. ***If desired, please provide additional comments for the SDT to consider*****.**
Bobbi Welch - Midcontinent ISO, Inc. - 2
Answer
Document Name
Comment
None
Likes 0
Dislikes 0
Response
Jennie Wike - Jennie Wike On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merrell, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Marc Donaldson, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; Terry Gifford, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; - Jennie Wike
Answer
Document Name
Comment
Tacoma Power supports the comments submitted by Platte River Power Authority with respect to modifying the language in FAC-008 R8 if retirement of the Requirement is not feasible.
Likes 0
Dislikes 0

Response	
Thank you for your comment. Please see responses to Platte River Power Authority. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Modification for Requirement R8 may be better suited for a future Periodic Review team of FAC-008 to consider.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name NPCC Regional Standards Committee	
Answer	
Document Name	
Comment	
We recommend that FAC-008 be prioritized for another revision (new project) to act on the potential revisions/corrections that were identified in Project 2017-03 FAC-008-3 Periodic Review.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Larry Heckert - Alliant Energy Corporation Services, Inc. - 4	
Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Evergy, 6, 1, 3, 5; Derek Brown, Evergy, 6, 1, 3, 5; Marcus Moor, Evergy, 6, 1, 3, 5; Thomas ROBBEN, Evergy, 6, 1, 3, 5; - Douglas Webb	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Joe Tarantino - Joe Tarantino On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Foung Mua, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Kevin Smith, Balancing Authority of Northern California, 1; Nicole Goi, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; - Joe Tarantino	
Answer	
Document Name	
Comment	
SMUD agrees with the comments submitted by Platter River Power. However, SMUD would like the SDT to consider providing clarificaiton to the sub-requirement R8.2 where, when requested for the owner to provide within 30-days, or other agreed upon timeframe, be clarified so that it is not an opening for expansion by auditors to request "cart blanc" the next most limiting element for all facilities. Auditors are requesting the "next most limiting element" expanding the scope of the standard.	

Likes 2	Austin Energy, 3, Preston W. Dwayne; Platte River Power Authority, 5, Archie Tyson
Dislikes 0	

Response

Thank you for your comment. Please see response to comments submitted by Platte River Power Authority. Clarifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Clarification for Requirement Part R8.2 may be better suited for a future Periodic Review team of FAC-008 to consider, or through a formal Request for Interpretation (RFI) to be submitted to NERC.

Tyson Archie - Platte River Power Authority - 5

Answer	
Document Name	

Comment

Platte River agrees with the SDT's recommendation to retire Requirement R7 from FAC-008-3 in response to FERC Oder No. 873. Platte River would like R8 to be retired in its entirety as we believe sufficient technical justification was provided for its retirement by NERC in their June 7, 2019 petition. If R8 cannot be retired in its entirety, we recommend revising R8 as detailed below.

Platte River recommends removing item 2) Total Transfer Capability (TTC) from Requirement 8.2, as TTC is primarily used for commercial operations not reliability. As stated in NERC's June 7, 2019 petition: "Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to SOLs and IROLs. If a scheduled interchange would violate SOLs or IROLs, the real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits." This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry.

Additionally, Platte River agrees with NERC's justification for the proposed retirement of the 56 MOD A Reliability Standards and their associated requirements which includes the rationale that these standards are commercial in nature. If/when the MOD A reliability

standards are retired, determining TTC will no longer be required by any NERC reliability standard. Removing TTC at this time would be forward looking and beneficial as to not have FAC-008-5 referencing an out of date term.

Platte River recommends removing or, at a minimum, defining 3) an impediment to generator deliverability. This term is not defined in the NERC Glossary of Terms, and to date, ERO-endorsed guidance is not available for entities to reference for defining generator deliverability. Due to the differences in size and complexity of registered entities and individual generating units, generator deliverability can vary widely. This creates inconsistency and confusion for reporting entities as well as regional entity staff.

Platte River recommends removing item 4) An impediment to service to a major load center from Requirement 8.2. Major load center is not defined in the NERC Glossary of Terms, and to date, ERO-endorsed guidance is not available for entities to reference for defining a major-load center. Due to the differences in size and complexity of registered entities, a major load center can vary widely. This creates inconsistency and confusion for reporting entities as well as regional entity staff.

Therefore, Platte River would like the SDT to consider the following proposed changes to Requirement R8, sub requirement 8.2.

Proposed changes to Requirement R8 of FAC-008-5:

R8: Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): [Violation Risk Factor: Medium] [Time Horizon: Operations Planning]

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing an Interconnection Reliability Operating Limit (IROL).

8.2.1. Identity of the existing next most limiting equipment of the Facility 8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1. In conclusion, Platte River believes the operation of the Bulk Electric System (BES) is rooted in determining and operating within SOL's and IROL's. Requirement 8.1 addresses the sharing of SOL's, and Platte River's recommendation for Requirement 8.2 addresses the critical nature of IROL's. Requirement 8.2, as currently written, strays from these two well-known and widely used terms.	
Likes 5	Tarantino Joe On Behalf of: Charles Norton, Sacramento Municipal Utility District, 3, 5, 6, 4, 1; Platte River Power Authority, 1, Thompson Matt; Platte River Power Authority, 3, Kiess Wade; Austin Energy, 3, Preston W. Dwayne; Wike Jennie On Behalf of: Hien Ho, Tacoma Public Utilities (Tacoma, WA), 3, 1, 4, 5, 6; John Merre
Dislikes 0	
Response	
Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	
Document Name	
Comment	

None.	
Likes 0	
Dislikes 0	
Response	
Cain Braveheart - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
As in its previous NOPR response, BPA agrees with FERC's assertion that Requirement R8's direction to communicate with Transmission Owners is not found in MOD-032, TOP-001, and/or IRO-010, therefore is a provision to be retained in FAC-008. BPA does, however, agree with the comments submitted by Platte River Power Authority and recommends that Requirement R8 be revised to add clarity and reduce undue burden on reporting entities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Please see responses to Platte River Power Authority. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Modification for Requirement R8 may be better suited for a future Periodic Review team of FAC-008 to consider.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	
Document Name	

Comment	
N/A.	
Likes 0	
Dislikes 0	
Response	
Tammy Porter - Tammy Porter On Behalf of: Lee Maurer, Oncor Electric Delivery, 1; - Tammy Porter	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Richard Jackson - U.S. Bureau of Reclamation - 1	
Answer	
Document Name	
Comment	
Since R8 will not be retired despite industry support, Reclamation recommends the drafting team seek to simplify R8 as a means of addressing industry opinion on its lack of value. Revising R8 could eliminate the difficulties of interpreting this requirement by narrowing	

the focus to address only the portions described in FERC's rationale for rejecting its retirement. Reclamation recommends the language of R8 be simplified to require TOs and GOs subject to R2 to identify the most limiting Element and second most limiting Element for each solely or jointly owned Facility.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Modification for Requirement R8 may be better suited for a future Periodic Review team of FAC-008 to consider.	
Mark Garza - FirstEnergy - FirstEnergy Corporation - 4, Group Name FE Voter	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Jeremy Lorigan - Seminole Electric Cooperative, Inc. - 3	
Answer	
Document Name	

Comment
R8 limits the provision of information from the TO (and applicable GO) to ONLY "***its associated*** RC, PC, TP, TO, and TOP" and does not have any provision for ***adjacent*** RCs, PCs, TPs, TOs, or TOPs to request similar information. I would be inclined to include language that adjacent entities can request this information which would be in-line with what FERC has issues in its NOPR on 11/19/2020 on "Managing Transmission Line Ratings." Also, I do disagree in part with the VSL's for R8 in that there is no quantitative way to measure whether an entity only provide "85%" of the information associated with a facility rating vs. "90%" and vs. "87%". I agree with the quantitative measure on whether the entity provided it within the 30 calendar days or within the agreed to time-frame.

Likes 0	
Dislikes 0	

Response
Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 or its related VSL's would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.

Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	

Texas RE noticed an apparent redundancy in the Severe VSL language. The proposed Severe VSL language indicates that entities providing less than 85% of the information required under FAC-008-5, R8 Part 8.1 commit a "Severe" level violation. Correspondingly, the final proposed Severe VSL category indicates that an entity's complete failure to provide rating information required pursuant to FAC-008-5, R8 Part 8.1 also constitutes a "Severe" level violation. From Texas RE's perspective, because an entity has already committed a "Severe" violation when it submits less than 85% of the information required under FAC-008-5, R8 Part 8.1, the additional language in the final section addressing a complete failure is wholly subsumed within the 85% or less provision. As such, Texas RE recommends its removal. Texas RE also noticed a space between 85 and % in the second to last sentence in the Severe VSL section.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. With respect to proposed Reliability Standard FAC-008-4, FERC Order No. 873, issued September 17, 2020, determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). The SDT discussed this and determined that Requirement R8, Part 8.1 provides a more definitive regulatory obligation for Transmission Owners to provide Facility Rating information for jointly-owned Facilities to other Transmission Owners than does Requirement R6. The SDT further discussed that the development of any additional justification for retiring Requirement R8 (in part or in its entirety), or modifications to FAC-008 to better justify retiring Requirement R8, may be better suited for a future Periodic Review team of FAC-008 consider. Modifications to FAC-008 or its related VSL's would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired.	
Kim Thomas - Duke Energy - 1,3,5,6 - Texas RE,SERC,RF, Group Name Duke Energy	
Answer	
Document Name	
Comment	

None.	
Likes 0	
Dislikes 0	
Response	
Dennis Sismaet - Northern California Power Agency - 6	
Answer	
Document Name	
Comment	
In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process. Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be Version 4 not Version 5. To my knowledge FERC did not approve the prior proposed V4. See item section 39 at link Federal Register :: Electric Reliability Organization Proposal To Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The retirement being proposed is a retirement to FAC-008-3. FAC-008-4 was remanded, but had gone through the development process so a new version number needed to be created for this development. It is, however a retirement to R7 of FAC-008-3. Developing a definition of jointly owned facilities may be better suited for the next Periodic Review team of FAC-008 to consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as	

retirements and references to requirements being retired. Since the BOT approved FAC-008-4 to be submitted to FERC for consideration, this revision must necessarily be FAC-008-5.	
Michael Whitney - Northern California Power Agency - 3,4,5,6	
Answer	
Document Name	
Comment	
In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process. Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be Version 4 not Version 5. To my knowledge FERC did not approve the prior proposed V4. See item section 39 at link Federal Register :: Electric Reliability Organization Proposal To Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review	
Likes 0	
Dislikes 0	
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Marty Hostler - Northern California Power Agency - 3,4,5,6	
Answer	
Document Name	

Comment
In the future the SDT or NERC should develop a formal definition of jointly owned facilities, since there appears to be conflicting interruptions being enforced that may not have been vetted in accordance with the NERC Standards Processes Manual Standards Interruption process. Additionally, the SAR was to modify V3 not V4. Thus the proposed Version should be V4. To my knowledge FERC did not approve the prior proposed V4.

Likes 0	
Dislikes 0	

Response
Thank you for your comment. The retirement being proposed is a retirement to FAC-008-3. FAC-008-4 was remanded, but had gone through the development process so a new version number needed to be created for this development. It is, however a retirement to R7 of FAC-008-3. Developing a definition of jointly owned facilities may be better suited for the next Periodic Review team of FAC-008 to consider. Modifications to FAC-008 would be outside the scope of the SAR this SDT is working under, which is strictly stated as retirements and references to requirements being retired. Since the BOT approved FAC-008-4 to be submitted to FERC for consideration, this revision must necessarily be FAC-008-5.

Dana Klem - MRO - 1,2,3,4,5,6 - MRO, Group Name MRO NSRF	
Answer	
Document Name	

Comment
None

Likes 0	
Dislikes 0	

Response

Daniela Atanasovski - APS - Arizona Public Service Co. - 1	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	

End of Report

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standards Announcement

REMINDER

Project 2018-03 Standards Efficiency Review Retirements

Initial Ballot and Non-ballot Poll Open through January 13, 2021

Now Available

The initial ballot and non-binding poll for **Project 2018-03 Standards Efficiency Review Retirements FAC-008-5 – Facility Ratings** is open through **8 p.m. Eastern, Wednesday, January 13, 2021**.

Balloting

Members of the ballot pools associated with this project can log in and submit votes by accessing the Standards Balloting and Commenting System (SBS). Contact Wendy Muller regarding issues using the SBS.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

The ballot results will be announced and posted on the project page. The drafting team will review all responses received during the comment period and determine the next steps of the project.

For information on the Standards Development Process, refer to the Standard Processes Manual.

For more information or assistance, contact Standards Developer, Laura Anderson (via email) or at (404) 446-9671.

North American Electric Reliability Corporation
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Atlanta, GA 30326
404-446-2560 | www.nerc.com

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standards Announcement

Project 2018-03 Standards Efficiency Review Retirements

Formal Comment Period Open through January 13, 2021
Ballot Pools Forming through December 29, 2020

Now Available

A 45-day comment period for **FAC-008-5 – Facility Ratings** is open through **8 p.m. Eastern, Wednesday, January 13, 2021**.

Commenting

Use the Standards Balloting and Commenting System (SBS) to submit comments. If you experience issues using the SBS, contact Wendy Muller. An unofficial Word version of the comment form is posted on the project page.

Ballot Pools

Ballot pools are being formed through **8 p.m. Eastern, Tuesday, December 29, 2020.** Registered Ballot Body members can join the ballot pools here.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

The initial ballot for the standard and non-binding poll of the associated Violation Risk Factors and Violation Severity Levels, will be conducted **January 4-13, 2021.**

For information on the Standards Development Process, refer to the Standard Processes Manual**.**

For more information or assistance, contact Standards Developer, Laura Anderson (via email) or at (404) 446-9671.

North American Electric Reliability Corporation
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Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

BALLOT RESULTS

Comment: View Comment Results (/CommentResults/Index/209)
Ballot Name: 2018-03 Standards Efficiency Review Retirements FAC-008-5 IN 1 ST
Voting Start Date: 1/4/2021 12:01:00 AM
Voting End Date: 1/13/2021 8:00:00 PM
Ballot Type: ST
Ballot Activity: IN
Ballot Series: 1
Total # Votes: 241
Total Ballot Pool: 268
Quorum: 89.93
Quorum Established Date: 1/13/2021 2:27:59 PM
Weighted Segment Value: 95.91

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	69	1	59	0.952	3	0.048	0	2	5
Segment: 2	8	0.6	6	0.6	0	0	0	1	1
Segment: 3	62	1	53	0.981	1	0.019	0	1	7
Segment: 4	15	1	12	0.923	1	0.077	0	0	2
Segment: 5	68	1	57	0.95	3	0.05	0	0	8
Segment: 6	41	1	34	0.944	2	0.056	0	1	4
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	1	0.1	1	0.1	0	0	0	0	0
Segment: 9	0	0	0	0	0	0	0	0	0

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 10	4	0.4	4	0.4	0	0	0	0	0
Totals:	268	6.1	226	5.851	10	0.249	0	5	27

BALLOT POOL MEMBERS

Show All entries Search: Search

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
1	Ameren - Ameren Services	Tamara Evey		None	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Affirmative	N/A
1	Arizona Electric Power Cooperative, Inc.	Jennifer Bray		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
1	Austin Energy	Thomas Standifur		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		None	N/A
1	Balancing Authority of Northern California	Kevin Smith	Joe Tarantino	Negative	Comments Submitted
1	Basin Electric Power Cooperative	David Rudolph		Affirmative	N/A
1	BC Hydro and Power Authority	Adrian Andreoiu		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Affirmative	N/A
1	Bonneville Power Administration	Kammy Rogers-Holliday		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		None	N/A
1	Cleco Corporation	John Lindsey		Affirmative	N/A
1	Dairyland Power Cooperative	Renee Leidel		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Candace Marshall		None	N/A
1	Duke Energy	Laura Lee		Affirmative	N/A
1	Edison International - Southern California Edison Company	Jose Avendano Mora		Affirmative	N/A
1	Entergy - Entergy Services, Inc.	Oliver Burke		Affirmative	N/A
1	Evergy	Allen Klassen	Douglas Webb	Affirmative	N/A
1	Eversource Energy	Quintin Lee		Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Julie Severino		Affirmative	N/A
1	Georgia Transmission Corporation	Greg Davis		Affirmative	N/A
1	Great River Energy	Gordon Pietsch		Affirmative	N/A
1	Hydro One Networks, Inc.	Payam Farahbakhsh		Affirmative	N/A
1	Hydro-Qu?bec TransEnergie	Nicolas Turcotte		Affirmative	N/A
1	IDACORP - Idaho Power Company	Laura Nelson		Affirmative	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Abstain	N/A
1	JEA	Joe McClung		Negative	Third-Party Comments
1	KAMO Electric Cooperative	Micah Breedlove		Affirmative	N/A
1	Los Angeles Department of Water and Power	faranak sarbaz		Affirmative	N/A
1	Lower Colorado River Authority	James Baldwin		Affirmative	N/A
1	Manitoba Hydro	Bruce Reimer		Affirmative	N/A
1	MEAG Power	David Weekley	Scott Miller	Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Andy Fuhrman	Affirmative	N/A
1	Muscatine Power and Water	Andy Kurriger		Affirmative	N/A
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	National Grid USA	Michael Jones		Affirmative	N/A
1	NB Power Corporation	Nurul Abser		Affirmative	N/A
1	Nebraska Public Power District	Jamison Cawley		Abstain	N/A
1	New York Power Authority	Salvatore Spagnolo		Affirmative	N/A
1	NextEra Energy - Florida Power and Light Co.	Mike ONeil		Affirmative	N/A
1	NiSource - Northern Indiana Public Service Co.	Steve Toosevich		Affirmative	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A
1	Omaha Public Power District	Doug Peterchuck		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Oncor Electric Delivery	Lee Maurer	Tammy Porter	Affirmative	N/A
1	Orlando Utilities Commission	Aaron Staley		Affirmative	N/A
1	OTP - Otter Tail Power Company	Charles Wicklund		Affirmative	N/A
1	Pacific Gas and Electric Company	Marco Rios		None	N/A
1	Platte River Power Authority	Matt Thompson		Negative	Comments Submitted
1	PPL Electric Utilities Corporation	Preston Walker		Affirmative	N/A
1	PSEG - Public Service Electric and Gas Co.	Randhir Singh		Affirmative	N/A
1	Public Utility District No. 1 of Chelan County	Ginette Lacasse		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Affirmative	N/A
1	Salt River Project	Chris Hofmann		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	SaskPower	Wayne Guttormson		Affirmative	N/A
1	Seattle City Light	Pawel Krupa		Affirmative	N/A
1	Seminole Electric Cooperative, Inc.	Bret Galbraith		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Affirmative	N/A
1	Sunflower Electric Power Corporation	Paul Mehlhaff		Affirmative	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A
1	Tennessee Valley Authority	Gabe Kurtz		Affirmative	N/A
1	Tri-State G and T Association, Inc.	Kjersti Drott		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	U.S. Bureau of Reclamation	Richard Jackson		Affirmative	N/A
1	Western Area Power Administration	sean erickson		Affirmative	N/A
1	Xcel Energy, Inc.	Dean Schiro		Affirmative	N/A
2	California ISO	Jamie Johnson		Abstain	N/A
2	Electric Reliability Council of Texas, Inc.	Brandon Gleason		Affirmative	N/A
2	Independent Electricity System Operator	Leonard Kula		None	N/A
2	ISO New England, Inc.	Michael Puscas		Affirmative	N/A
2	Midcontinent ISO, Inc.	Bobbi Welch		Affirmative	N/A
2	New York Independent System Operator	Gregory Campoli		Affirmative	N/A
2	PJM Interconnection, L.L.C.	Tom Foster	Elizabeth Davis	Affirmative	N/A
2	Southwest Power Pool, Inc. (RTO)	Charles Yeung		Affirmative	N/A
3	AEP	Kent Feliks		Affirmative	N/A
3	AES - Indianapolis Power and Light Co.	Colleen Campbell		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras		Affirmative	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		Affirmative	N/A
3	Austin Energy	W. Dwayne Preston		Affirmative	N/A
3	Avista - Avista Corporation	Scott Kinney		None	N/A
3	Basin Electric Power Cooperative	Jeremy Voll		Affirmative	N/A
3	BC Hydro and Power Authority	Hootan Jarollahi		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Darnez Gresham		Affirmative	N/A
3	Black Hills Corporation	Don Stahl		Affirmative	N/A
3	Bonneville Power Administration	Ken Lanehome		Affirmative	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
3	Cleco Corporation	Maurice Paulk		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	Dominion - Dominion Resources, Inc.	Connie Lowe		Affirmative	N/A
3	DTE Energy - Detroit Edison Company	Karie Barczak		Affirmative	N/A
3	Duke Energy	Lee Schuster		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Evergy	Marcus Moor	Douglas Webb	Affirmative	N/A
3	Eversource Energy	Christopher McKinnon		Affirmative	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
3	Florida Municipal Power Agency	Dale Ray	Truong Le	Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A
3	Imperial Irrigation District	Glen Allegranza	Denise Sanchez	Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	JEA	Garry Baker		None	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
3	Lakeland Electric	Patricia Boody		None	N/A
3	Lincoln Electric System	Jason Fortik		Affirmative	N/A
3	Los Angeles Department of Water and Power	Tony Skourtas		Affirmative	N/A
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A
3	Manitoba Hydro	Karim Abdel-Hadi		Affirmative	N/A
3	MEAG Power	Roger Brand	Scott Miller	Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Abstain	N/A
3	New York Power Authority	David Rivera		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		None	N/A
3	NW Electric Power Cooperative, Inc.	John Stickley		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
3	OTP - Otter Tail Power Company	Wendi Olson		Affirmative	N/A
3	Owensboro Municipal Utilities	Thomas Lyons		Affirmative	N/A
3	Platte River Power Authority	Wade Kiess		Negative	Comments Submitted

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Portland General Electric Co.	Dan Zollner		None	N/A
3	PPL - Louisville Gas and Electric Co.	James Frank		Affirmative	N/A
3	PSEG - Public Service Electric and Gas Co.	maria pardo		Affirmative	N/A
3	Public Utility District No. 1 of Chelan County	Joyce Gundry		Affirmative	N/A
3	Puget Sound Energy, Inc.	Tim Womack		None	N/A
3	Santee Cooper	James Poston		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	Jeremy Lorigan		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jarrod Murdaugh		Affirmative	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Affirmative	N/A
3	Southern Company - Alabama Power Company	Joel Dembowski		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	Marc Donaldson	Jennie Wike	Affirmative	N/A
3	TECO - Tampa Electric Co.	Ronald Donahey		None	N/A
3	Tennessee Valley Authority	Ian Grant		Affirmative	N/A
3	Tri-State G and T Association, Inc.	Janelle Marriott Gill		Affirmative	N/A
3	WEC Energy Group, Inc.	Thomas Breene		Affirmative	N/A
3	Xcel Energy, Inc.	Ray Jasicki		Affirmative	N/A
4	Alliant Energy Corporation Services, Inc.	Larry Heckert		Affirmative	N/A
4	Austin Energy	Jun Hua		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
4	City Utilities of Springfield, Missouri	John Allen		Affirmative	N/A
4	CMS Energy - Consumers Energy Company	Aric Root		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
4	Florida Municipal Power Agency	Carol Chinn	Truong Le	Affirmative	N/A
4	LaGen	Wayne Messina		None	N/A
4	MGE Energy - Madison Gas and Electric Co.	Joseph DePoorter		Affirmative	N/A
4	Modesto Irrigation District	Spencer Tacke		None	N/A
4	Public Utility District No. 1 of Snohomish County	John Martinsen		Affirmative	N/A
4	Public Utility District No. 2 of Grant County, Washington	Karla Weaver		Affirmative	N/A
4	Sacramento Municipal Utility District	Foung Mua	Joe Tarantino	Negative	Comments Submitted
4	Seattle City Light	Hao Li		Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
4	WEC Energy Group, Inc.	Matthew Beilfuss		Affirmative	N/A
5	Acciona Energy North America	George Brown		Affirmative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A
5	APS - Arizona Public Service Co.	Kelsi Rigby		Affirmative	N/A
5	Austin Energy	Michael Dillard		Affirmative	N/A
5	Avista - Avista Corporation	Glen Farmer		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Basin Electric Power Cooperative	Colleen Peterson		Affirmative	N/A
5	BC Hydro and Power Authority	Helen Hamilton Harding		None	N/A
5	Berkshire Hathaway - NV Energy	Kevin Salsbury		Affirmative	N/A
5	Black Hills Corporation	Derek Silbaugh		Affirmative	N/A
5	Boise-Kuna Irrigation District - Lucky Peak Power Plant Project	Mike Kukla		Affirmative	N/A
5	Bonneville Power Administration	Scott Winner		Affirmative	N/A
5	Brazos Electric Power Cooperative, Inc.	Shari Heino		None	N/A
5	Cleco Corporation	Stephanie Huffman		None	N/A
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Affirmative	N/A
5	Colorado Springs Utilities	Jeff Icke		None	N/A
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Rachel Snead		None	N/A
5	DTE Energy - Detroit Edison Company	Adrian Raducea		None	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
5	Edison International - Southern California Edison Company	Neil Shockey		Affirmative	N/A
5	Entergy	Jamie Prater		Affirmative	N/A
5	Evergy	Derek Brown	Douglas Webb	Affirmative	N/A
5	Exelon	Cynthia Lee		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	FirstEnergy - FirstEnergy Corporation	Robert Loy		Affirmative	N/A
5	Florida Municipal Power Agency	Chris Gowder	Truong Le	Affirmative	N/A
5	Great River Energy	Jacalynn Bentz		Affirmative	N/A
5	Herb Schrayshuen	Herb Schrayshuen		Affirmative	N/A
5	Hydro-Qu?bec Production	Carl Pineault		Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza	Denise Sanchez	Affirmative	N/A
5	JEA	John Babik		Negative	Third-Party Comments
5	Lincoln Electric System	Kayleigh Wilkerson		Affirmative	N/A
5	Los Angeles Department of Water and Power	Glenn Barry		Affirmative	N/A
5	Lower Colorado River Authority	Teresa Cantwell		Affirmative	N/A
5	Manitoba Hydro	Yuguang Xiao		Affirmative	N/A
5	Massachusetts Municipal Wholesale Electric Company	Anthony Stevens		Affirmative	N/A
5	Muscatine Power and Water	Neal Nelson		Affirmative	N/A
5	National Grid USA	Elizabeth Spivak		Affirmative	N/A
5	NB Power Corporation	Rob Vance		Affirmative	N/A
5	New York Power Authority	Shivaz Chopra		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
5	NovaSource Power Services	Bradley Collard		None	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
5	Omaha Public Power District	Mahmood Safi		Affirmative	N/A
5	Ontario Power Generation Inc.	Constantin Chitescu		Affirmative	N/A
5	Orlando Utilities Commission	Dania Colon		Affirmative	N/A
5	OTP - Otter Tail Power Company	Brett Jacobs		Affirmative	N/A
5	Pacific Gas and Electric Company	Ed Hanson		Affirmative	N/A
5	Platte River Power Authority	Tyson Archie		Negative	Comments Submitted
5	Portland General Electric Co.	Ryan Olson		None	N/A
5	PPL - Louisville Gas and Electric Co.	JULIE HOSTRANDER		Affirmative	N/A
5	PSEG - PSEG Fossil LLC	Tim Kucey		Affirmative	N/A
5	Public Utility District No. 1 of Chelan County	Meaghan Connell		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Sam Nietfeld		Affirmative	N/A
5	Public Utility District No. 2 of Grant County, Washington	Amy Jones		Affirmative	N/A
5	Sacramento Municipal Utility District	Nicole Goi	Joe Tarantino	Negative	Comments Submitted
5	Salt River Project	Kevin Nielsen		Affirmative	N/A
5	Santee Cooper	Tommy Curtis		Affirmative	N/A
5	Seattle City Light	Faz Kasraie		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Mickey Bellard		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Southern Company - Southern Company Generation	James Howell		Affirmative	N/A
5	Talen Generation, LLC	Donald Lock		Affirmative	N/A
5	Tennessee Valley Authority	M Lee Thomas		Affirmative	N/A
5	Tri-State G and T Association, Inc.	Ryan Walter		Affirmative	N/A
5	U.S. Bureau of Reclamation	Wendy Center		Affirmative	N/A
5	WEC Energy Group, Inc.	Janet OBrien		Affirmative	N/A
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A
6	AEP	JT Kuehne		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Affirmative	N/A
6	Associated Electric Cooperative, Inc.	Brian Ackermann		None	N/A
6	Austin Energy	Andrew Gallo		Affirmative	N/A
6	Basin Electric Power Cooperative	Jerry Horner		Affirmative	N/A
6	Black Hills Corporation	Eric Scherr		Affirmative	N/A
6	Bonneville Power Administration	Andrew Meyers		Affirmative	N/A
6	Cleco Corporation	Robert Hirchak		Affirmative	N/A
6	Dominion - Dominion Resources, Inc.	Sean Bodkin		None	N/A
6	Duke Energy	Greg Cecil		Affirmative	N/A
6	Evergy	Thomas ROBBEN	Douglas Webb	Affirmative	N/A
6	Exelon	Becky Webb		Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Ann Carey		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Florida Municipal Power Agency	Richard Montgomery	Truong Le	Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
6	Los Angeles Department of Water and Power	Anton Vu		Affirmative	N/A
6	Manitoba Hydro	Blair Mukanik		Affirmative	N/A
6	Muscatine Power and Water	Nick Burns		Affirmative	N/A
6	New York Power Authority	Erick Barrios		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		None	N/A
6	NiSource - Northern Indiana Public Service Co.	Joe O'Brien		Affirmative	N/A
6	Northern California Power Agency	Dennis Sismaet		Abstain	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Sing Tay		Affirmative	N/A
6	Omaha Public Power District	Joel Robles		Affirmative	N/A
6	Platte River Power Authority	Sabrina Martz		Negative	Comments Submitted
6	Portland General Electric Co.	Daniel Mason		Affirmative	N/A
6	Powerex Corporation	Gordon Dobson-Mack		None	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Affirmative	N/A
6	PSEG - PSEG Energy Resources and Trade LLC	Joseph Neglia		Affirmative	N/A
6	Public Utility District No. 1 of Chelan County	Glen Pruitt		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Public Utility District No. 2 of Grant County, Washington	LeRoy Patterson		Affirmative	N/A
6	Sacramento Municipal Utility District	Charles Norton	Joe Tarantino	Negative	Comments Submitted
6	Santee Cooper	Marty Watson		Affirmative	N/A
6	Seattle City Light	Brian Belger		Affirmative	N/A
6	Snohomish County PUD No. 1	John Liang		Affirmative	N/A
6	Southern Company - Southern Company Generation	Ron Carlsen		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
6	Tennessee Valley Authority	Marjorie Parsons		Affirmative	N/A
6	WEC Energy Group, Inc.	David Hathaway		Affirmative	N/A
6	Xcel Energy, Inc.	Carrie Dixon		Affirmative	N/A
8	David Kiguel	David Kiguel		Affirmative	N/A
10	New York State Reliability Council	ALAN ADAMSON		Affirmative	N/A
10	Northeast Power Coordinating Council	Guy V. Zito		Affirmative	N/A
10	ReliabilityFirst	Anthony Jablonski		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A

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Showing 1 to 268 of 268 entries

BALLOT RESULTS

Ballot Name: 2018-03 Standards Efficiency Review Retirements FAC-008-5 Non-binding Poll IN 1 ST
Voting Start Date: 1/4/2021 12:01:00 AM
Voting End Date: 1/13/2021 8:00:00 PM
Ballot Type: ST
Ballot Activity: IN
Ballot Series: 1
Total # Votes: 220
Total Ballot Pool: 254
Quorum: 86.61
Quorum Established Date: 1/13/2021 2:58:41 PM
Weighted Segment Value: 100

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	66	1	47	1	0	0	4	7	8
Segment: 2	8	0.5	5	0.5	0	0	0	2	1
Segment: 3	60	1	44	1	0	0	1	7	8
Segment: 4	14	1	11	1	0	0	1	0	2
Segment: 5	62	1	46	1	0	0	3	3	10
Segment: 6	39	1	27	1	0	0	1	6	5
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	1	0.1	1	0.1	0	0	0	0	0
Segment: 9	0	0	0	0	0	0	0	0	0
Segment: 10	4	0.3	3	0.3	0	0	0	1	0

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Totals:	254	5.9	184	5.9	0	0	10	26	34

BALLOT POOL MEMBERS

Show All entries Search: Search

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
1	Ameren - Ameren Services	Tamara Evey		None	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Affirmative	N/A
1	Arizona Electric Power Cooperative, Inc.	Jennifer Bray		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
1	Austin Energy	Thomas Standifur		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		None	N/A
1	Balancing Authority of Northern California	Kevin Smith	Joe Tarantino	Negative	No Comment Submitted
1	Basin Electric Power Cooperative	David Rudolph		Affirmative	N/A
1	BC Hydro and Power Authority	Adrian Andreoiu		Abstain	N/A
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Bonneville Power Administration	Kammy Rogers-Holliday		None	N/A
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		None	N/A
1	Cleco Corporation	John Lindsey		Affirmative	N/A
1	Dairyland Power Cooperative	Renee Leidel		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Candace Marshall		None	N/A
1	Duke Energy	Laura Lee		Affirmative	N/A
1	Entergy - Entergy Services, Inc.	Oliver Burke		Affirmative	N/A
1	Evergy	Allen Klassen	Douglas Webb	Affirmative	N/A
1	Eversource Energy	Quintin Lee		Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Julie Severino		Affirmative	N/A
1	Georgia Transmission Corporation	Greg Davis		Affirmative	N/A
1	Great River Energy	Gordon Pietsch		Affirmative	N/A
1	Hydro One Networks, Inc.	Payam Farahbakhsh		Affirmative	N/A
1	Hydro-Qu?bec TransEnergie	Nicolas Turcotte		Affirmative	N/A
1	IDACORP - Idaho Power Company	Laura Nelson		Affirmative	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Abstain	N/A
1	JEA	Joe McClung		Negative	No Comment Submitted

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	KAMO Electric Cooperative	Micah Breedlove		Affirmative	N/A
1	Los Angeles Department of Water and Power	faranak sarbaz		Affirmative	N/A
1	Lower Colorado River Authority	James Baldwin		Affirmative	N/A
1	MEAG Power	David Weekley	Scott Miller	Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Andy Fuhrman	Affirmative	N/A
1	Muscatine Power and Water	Andy Kurriger		Affirmative	N/A
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	National Grid USA	Michael Jones		Affirmative	N/A
1	NB Power Corporation	Nurul Abser		Affirmative	N/A
1	Nebraska Public Power District	Jamison Cawley		Abstain	N/A
1	New York Power Authority	Salvatore Spagnolo		Affirmative	N/A
1	NextEra Energy - Florida Power and Light Co.	Mike ONeil		Affirmative	N/A
1	NiSource - Northern Indiana Public Service Co.	Steve Toosevich		Affirmative	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A
1	Omaha Public Power District	Doug Peterchuck		Affirmative	N/A
1	Oncor Electric Delivery	Lee Maurer	Tammy Porter	Affirmative	N/A
1	Orlando Utilities Commission	Aaron Staley		None	N/A
1	OTP - Otter Tail Power Company	Charles Wicklund		Affirmative	N/A
1	Pacific Gas and Electric Company	Marco Rios		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Platte River Power Authority	Matt Thompson		Abstain	N/A
1	PPL Electric Utilities Corporation	Preston Walker		None	N/A
1	PSEG - Public Service Electric and Gas Co.	Randhir Singh		Abstain	N/A
1	Public Utility District No. 1 of Chelan County	Ginette Lacasse		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Affirmative	N/A
1	Salt River Project	Chris Hofmann		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	SaskPower	Wayne Guttormson		Abstain	N/A
1	Seattle City Light	Pawel Krupa		Affirmative	N/A
1	Seminole Electric Cooperative, Inc.	Bret Galbraith		Negative	No Comment Submitted
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Affirmative	N/A
1	Sunflower Electric Power Corporation	Paul Mehlhaff		Affirmative	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A
1	Tennessee Valley Authority	Gabe Kurtz		Abstain	N/A
1	Tri-State G and T Association, Inc.	Kjersti Drott		Affirmative	N/A
1	U.S. Bureau of Reclamation	Richard Jackson		Affirmative	N/A
1	Western Area Power Administration	sean erickson		Negative	No Comment Submitted
2	California ISO	Jamie Johnson		Abstain	N/A
2	Electric Reliability Council of Texas, Inc.	Brandon Gleason		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
2	Independent Electricity System Operator	Leonard Kula		None	N/A
2	ISO New England, Inc.	Michael Puscas		Affirmative	N/A
2	Midcontinent ISO, Inc.	Bobbi Welch		Affirmative	N/A
2	New York Independent System Operator	Gregory Campoli		Abstain	N/A
2	PJM Interconnection, L.L.C.	Tom Foster	Elizabeth Davis	Affirmative	N/A
2	Southwest Power Pool, Inc. (RTO)	Charles Yeung		Affirmative	N/A
3	AEP	Kent Feliks		Affirmative	N/A
3	AES - Indianapolis Power and Light Co.	Colleen Campbell		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras		Abstain	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		Affirmative	N/A
3	Austin Energy	W. Dwayne Preston		Affirmative	N/A
3	Avista - Avista Corporation	Scott Kinney		None	N/A
3	Basin Electric Power Cooperative	Jeremy Voll		Affirmative	N/A
3	BC Hydro and Power Authority	Hootan Jarollahi		Abstain	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Darnez Gresham		Affirmative	N/A
3	Black Hills Corporation	Don Stahl		Affirmative	N/A
3	Bonneville Power Administration	Ken Lanehome		Affirmative	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
3	Cleco Corporation	Maurice Paulk		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	Dominion - Dominion Resources, Inc.	Connie Lowe		Abstain	N/A
3	DTE Energy - Detroit Edison Company	Karie Barczak		Affirmative	N/A
3	Duke Energy	Lee Schuster		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Evergy	Marcus Moor	Douglas Webb	Affirmative	N/A
3	Eversource Energy	Christopher McKinnon		Affirmative	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
3	Florida Municipal Power Agency	Dale Ray	Truong Le	Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A
3	Imperial Irrigation District	Glen Allegranza	Denise Sanchez	Affirmative	N/A
3	JEA	Garry Baker		None	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A
3	Lakeland Electric	Patricia Boody		None	N/A
3	Lincoln Electric System	Jason Fortik		Affirmative	N/A
3	Los Angeles Department of Water and Power	Tony Skourtas		Affirmative	N/A
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	MEAG Power	Roger Brand	Scott Miller	Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Abstain	N/A
3	New York Power Authority	David Rivera		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		None	N/A
3	NW Electric Power Cooperative, Inc.	John Stickley		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
3	OTP - Otter Tail Power Company	Wendi Olson		Affirmative	N/A
3	Owensboro Municipal Utilities	Thomas Lyons		Affirmative	N/A
3	Platte River Power Authority	Wade Kiess		Abstain	N/A
3	Portland General Electric Co.	Dan Zollner		None	N/A
3	PPL - Louisville Gas and Electric Co.	James Frank		None	N/A
3	PSEG - Public Service Electric and Gas Co.	maria pardo		Abstain	N/A
3	Public Utility District No. 1 of Chelan County	Joyce Gundry		Affirmative	N/A
3	Puget Sound Energy, Inc.	Tim Womack		None	N/A
3	Santee Cooper	James Poston		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Seminole Electric Cooperative, Inc.	Jeremy Lorigan		Negative	No Comment Submitted
3	Sho-Me Power Electric Cooperative	Jarrod Murdaugh		Affirmative	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Affirmative	N/A
3	Southern Company - Alabama Power Company	Joel Dembowski		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	Marc Donaldson	Jennie Wike	Affirmative	N/A
3	TECO - Tampa Electric Co.	Ronald Donahey		None	N/A
3	Tennessee Valley Authority	Ian Grant		Abstain	N/A
3	Tri-State G and T Association, Inc.	Janelle Marriott Gill		Affirmative	N/A
3	WEC Energy Group, Inc.	Thomas Breene		Affirmative	N/A
4	Alliant Energy Corporation Services, Inc.	Larry Heckert		Affirmative	N/A
4	Austin Energy	Jun Hua		Affirmative	N/A
4	City Utilities of Springfield, Missouri	John Allen		Affirmative	N/A
4	CMS Energy - Consumers Energy Company	Aric Root		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A
4	Florida Municipal Power Agency	Carol Chinn	Truong Le	Affirmative	N/A
4	LaGen	Wayne Messina		None	N/A
4	Modesto Irrigation District	Spencer Tacke		None	N/A
4	Public Utility District No. 1 of Snohomish County	John Martinsen		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
4	Public Utility District No. 2 of Grant County, Washington	Karla Weaver		Affirmative	N/A
4	Sacramento Municipal Utility District	Foung Mua	Joe Tarantino	Negative	No Comment Submitted
4	Seattle City Light	Hao Li		Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
4	WEC Energy Group, Inc.	Matthew Beilfuss		Affirmative	N/A
5	Acciona Energy North America	George Brown		Affirmative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Abstain	N/A
5	APS - Arizona Public Service Co.	Kelsi Rigby		Affirmative	N/A
5	Austin Energy	Michael Dillard		Affirmative	N/A
5	Avista - Avista Corporation	Glen Farmer		Affirmative	N/A
5	Basin Electric Power Cooperative	Colleen Peterson		Affirmative	N/A
5	BC Hydro and Power Authority	Helen Hamilton Harding		None	N/A
5	Berkshire Hathaway - NV Energy	Kevin Salsbury		Affirmative	N/A
5	Boise-Kuna Irrigation District - Lucky Peak Power Plant Project	Mike Kukla		Affirmative	N/A
5	Bonneville Power Administration	Scott Winner		Affirmative	N/A
5	Brazos Electric Power Cooperative, Inc.	Shari Heino		None	N/A
5	Cleco Corporation	Stephanie Huffman		None	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Affirmative	N/A
5	Colorado Springs Utilities	Jeff Icke		None	N/A
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Rachel Snead		None	N/A
5	DTE Energy - Detroit Edison Company	Adrian Raducea		None	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
5	Edison International - Southern California Edison Company	Neil Shockey		Affirmative	N/A
5	Entergy	Jamie Prater		Affirmative	N/A
5	Evergy	Derek Brown	Douglas Webb	Affirmative	N/A
5	Exelon	Cynthia Lee		Affirmative	N/A
5	FirstEnergy - FirstEnergy Corporation	Robert Loy		Affirmative	N/A
5	Florida Municipal Power Agency	Chris Gowder	Truong Le	Affirmative	N/A
5	Great River Energy	Jacalynn Bentz		Affirmative	N/A
5	Herb Schrayshuen	Herb Schrayshuen		Affirmative	N/A
5	Hydro-Qu?bec Production	Carl Pineault		Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza	Denise Sanchez	Affirmative	N/A
5	JEA	John Babik		Negative	No Comment Submitted
5	Lincoln Electric System	Kayleigh Wilkerson		Affirmative	N/A
5	Los Angeles Department of Water and Power	Glenn Barry		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Lower Colorado River Authority	Teresa Cantwell		Affirmative	N/A
5	Massachusetts Municipal Wholesale Electric Company	Anthony Stevens		Affirmative	N/A
5	Muscatine Power and Water	Neal Nelson		Affirmative	N/A
5	NB Power Corporation	Rob Vance		Affirmative	N/A
5	New York Power Authority	Shivaz Chopra		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
5	NovaSource Power Services	Bradley Collard		None	N/A
5	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
5	Omaha Public Power District	Mahmood Safi		Affirmative	N/A
5	Ontario Power Generation Inc.	Constantin Chitescu		Affirmative	N/A
5	Orlando Utilities Commission	Dania Colon		Affirmative	N/A
5	OTP - Otter Tail Power Company	Brett Jacobs		Affirmative	N/A
5	Pacific Gas and Electric Company	Ed Hanson		Affirmative	N/A
5	Platte River Power Authority	Tyson Archie		Abstain	N/A
5	Portland General Electric Co.	Ryan Olson		None	N/A
5	PPL - Louisville Gas and Electric Co.	JULIE HOSTRANDER		None	N/A
5	PSEG - PSEG Fossil LLC	Tim Kucey		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Public Utility District No. 1 of Chelan County	Meaghan Connell		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Sam Nietfeld		Affirmative	N/A
5	Public Utility District No. 2 of Grant County, Washington	Amy Jones		Affirmative	N/A
5	Sacramento Municipal Utility District	Nicole Goi	Joe Tarantino	Negative	No Comment Submitted
5	Salt River Project	Kevin Nielsen		Affirmative	N/A
5	Santee Cooper	Tommy Curtis		Affirmative	N/A
5	Seattle City Light	Faz Kasraie		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Mickey Bellard		Negative	No Comment Submitted
5	Southern Company - Southern Company Generation	James Howell		Affirmative	N/A
5	Tennessee Valley Authority	M Lee Thomas		None	N/A
5	Tri-State G and T Association, Inc.	Ryan Walter		Affirmative	N/A
5	U.S. Bureau of Reclamation	Wendy Center		Affirmative	N/A
5	WEC Energy Group, Inc.	Janet OBrien		Affirmative	N/A
6	AEP	JT Kuehne		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		Abstain	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Affirmative	N/A
6	Associated Electric Cooperative, Inc.	Brian Ackermann		None	N/A
6	Austin Energy	Andrew Gallo		Affirmative	N/A
6	Basin Electric Power Cooperative	Jerry Horner		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Black Hills Corporation	Eric Scherr		Affirmative	N/A
6	Bonneville Power Administration	Andrew Meyers		Affirmative	N/A
6	Cleco Corporation	Robert Hirchak		Affirmative	N/A
6	Dominion - Dominion Resources, Inc.	Sean Bodkin		None	N/A
6	Duke Energy	Greg Cecil		Affirmative	N/A
6	Evergy	Thomas ROBBEN	Douglas Webb	Affirmative	N/A
6	Exelon	Becky Webb		Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Ann Carey		Affirmative	N/A
6	Florida Municipal Power Agency	Richard Montgomery	Truong Le	Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
6	Los Angeles Department of Water and Power	Anton Vu		Affirmative	N/A
6	Muscatine Power and Water	Nick Burns		Affirmative	N/A
6	New York Power Authority	Erick Barrios		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		None	N/A
6	NiSource - Northern Indiana Public Service Co.	Joe O'Brien		Affirmative	N/A
6	Northern California Power Agency	Dennis Sismaet		Abstain	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Sing Tay		Affirmative	N/A
6	Omaha Public Power District	Joel Robles		Affirmative	N/A
6	Platte River Power Authority	Sabrina Martz		Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Portland General Electric Co.	Daniel Mason		Affirmative	N/A
6	Powerex Corporation	Gordon Dobson-Mack		None	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		None	N/A
6	PSEG - PSEG Energy Resources and Trade LLC	Joseph Neglia		Abstain	N/A
6	Public Utility District No. 1 of Chelan County	Glen Pruitt		Affirmative	N/A
6	Public Utility District No. 2 of Grant County, Washington	LeRoy Patterson		Affirmative	N/A
6	Sacramento Municipal Utility District	Charles Norton	Joe Tarantino	Negative	No Comment Submitted
6	Santee Cooper	Marty Watson		Affirmative	N/A
6	Snohomish County PUD No. 1	John Liang		Affirmative	N/A
6	Southern Company - Southern Company Generation	Ron Carlsen		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
6	Tennessee Valley Authority	Marjorie Parsons		Abstain	N/A
6	WEC Energy Group, Inc.	David Hathaway		Affirmative	N/A
6	Xcel Energy, Inc.	Carrie Dixon		Abstain	N/A
8	David Kiguel	David Kiguel		Affirmative	N/A
10	New York State Reliability Council	ALAN ADAMSON		Affirmative	N/A
10	Northeast Power Coordinating Council	Guy V. Zito		Affirmative	N/A
10	ReliabilityFirst	Anthony Jablonski		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
10	Texas Reliability Entity, Inc.	Rachel Coyne		Abstain	N/A

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A. Introduction

1. **Title:** Facility Ratings

2. **Number:** FAC-008-5

3. **Purpose:** To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits.

4. **Applicability:**

   4.1. Transmission Owner

   4.2. Generator Owner

5. **Effective Date:** See Implementation Plan.

B. Requirements and Measures

R1. Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facility(ies) up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up transformer. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

1.1. The documentation shall contain assumptions used to rate the generator and at least one of the following:

- Design or construction information such as design criteria, ratings provided by equipment manufacturers, equipment drawings and/or specifications, engineering analyses, method(s) consistent with industry standards (e.g. ANSI and IEEE), or an established engineering practice that has been verified by testing or engineering analysis.
- Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.

1.2. The documentation shall be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

M1. Each Generator Owner shall have documentation that shows how its Facility Ratings were determined as identified in Requirement 1.

R2. Each Generator Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner that contains all of the following. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

2.1. The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronic Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

2.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R2, Part 2.1 including identification of how each of the following were considered:

2.2.1. Equipment Rating standard(s) used in development of this methodology.

2.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

2.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

2.2.4. Operating limitations.[1]

2.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

2.4. The process by which the Rating of equipment that comprises a Facility is determined.

2.4.1. The scope of equipment addressed shall include, but not be limited to, conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

2.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M2. Each Generator Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 2, Parts 2.1 through 2.4.

R3. Each Transmission Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned Facilities (except for those generating unit Facilities addressed in R1 and R2) that contains all of the following: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

3.1. The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronics Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

[1] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

3.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R3, Part 3.1 including identification of how each of the following were considered:

3.2.1. Equipment Rating standard(s) used in development of this methodology.

3.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

3.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

3.2.4. Operating limitations.[2]

3.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

3.4. The process by which the Rating of equipment that comprises a Facility is determined.

3.4.1. The scope of equipment addressed shall include, but not be limited to, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

3.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M3. Each Transmission Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 3, Parts 3.1 through 3.4.

R4. Reserved.

M4. Reserved.

R5. Reserved.

M5. Reserved.

R6. Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

M6. Each Transmission Owner and Generator Owner shall have evidence to show that its Facility Ratings are consistent with the documentation for determining its Facility Ratings as specified in Requirement R1 or consistent with its Facility Ratings methodology as specified in Requirements R2 and R3 (Requirement R6).

R7. Reserved.

M7. Reserved.

[2] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

R8. Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center:

8.2.1. Identity of the existing next most limiting equipment of the Facility

8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

M8. Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R8.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority: "Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Compliance Monitoring and Enforcement Processes:

- Self-Certifications
- Spot Checking
- Compliance Audits
- Self-Reporting

- Compliance Violation Investigations
- Complaints

1.3. Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The Generator Owner shall keep its current documentation (for R1) and any modifications to the documentation that were in force since last compliance audit period for Measure M1 and Measure M6.
- The Generator Owner shall keep its current, in force Facility Ratings methodology (for R2) and any modifications to the methodology that were in force since last compliance audit period for Measure M2 and Measure M6.
- The Transmission Owner shall keep its current, in force Facility Ratings methodology (for R3) and any modifications to the methodology that were in force since the last compliance audit for Measure M3 and Measure M6.
- The Transmission Owner and Generator Owner shall keep its current, in force Facility Ratings and any changes to those ratings for three calendar years for Measure M6.
- The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
- If a Generator Owner or Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant.
- The Compliance Enforcement Authority shall keep the last audit and all subsequent compliance records.

1.4. Compliance Monitoring and Enforcement Program: As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.1.	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.2.	The Generator Owner failed to provide documentation for determining its Facility Ratings.
R2.	The Generator Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology did not address all the components of Requirement R2, Part 2.4. OR The Generator Owner failed to include in its Facility Rating Methodology, three of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in Requirement R2, Part 2.3 OR The Generator Owner failed to include in its Facility Rating Methodology four or more of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R3.	The Transmission Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology did not address either of the following Parts of Requirement R3: • 3.4.1 • 3.4.2 OR The Transmission Owner failed to include in its Facility Rating methodology three of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology failed to recognize a Facility's rating based on the most limiting component rating as required in Requirement R3, Part 3.3 OR The Transmission Owner failed to include in its Facility Rating methodology four or more of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4
R4. Reserved.				
R5. Reserved.				

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R6.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for 5% or less of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 5% or more, but less than up to (and including) 10% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 10% up to (and including) 15% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than15% of its solely owned and jointly owned Facilities. (R6)
R7. Reserved.				
R8.	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to and including 15 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 100%,	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 95%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 90%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 85% of the required Rating information to all of the

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	but not less than or equal to 95% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but the information was provided up to and including 15 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 100%, but not less than or equal to 95% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 90% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more 15 calendar days but less than or equal to 25 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 95%, but not less than or equal to 90% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 85% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 25 calendar days but less than or equal to 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 90%, but no less than or equal to 85% of the required Rating information to the requesting entity. (R8, Part 8.2)	requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 85 % of the required Rating information to the requesting entity. (R8, Part 8.2) OR The responsible entity failed to provide its Rating information to the requesting entity. (R8, Part 8.1)

D. Regional Variances

None.

E. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	Feb 7, 2006	Approved by Board of Trustees	New
1	Mar 16, 2007	Approved by FERC	New
2	May 12, 2010	Approved by Board of Trustees	Complete Revision, merging FAC_008-1 and FAC-009-1 under Project 2009-06 and address directives from Order 693
3	May 24, 2011	Addition of Requirement R8	Project 2009-06 Expansion to address third directive from Order 693
3	May 24, 2011	Adopted by NERC Board of Trustees	
3	November 17, 2011	FERC Order issued approving FAC-008-3	
3	May 17, 2012	FERC Order issued directing the VRF for Requirement R2 be changed from “Lower” to “Medium”	
3	February 7, 2013	R4 and R5 and associated elements approved by NERC Board of Trustees for retirement as part of the Paragraph 81 project (Project 2013-02) pending applicable regulatory approval.	
3	November 21, 2013	R4 and R5 and associated elements approved by FERC for retirement as part of the Paragraph 81 project (Project 2013-02)	
4	May 9, 2020	R7 and R8 and associated elements adopted by NERC Board of Trustees for retirement as part of Project 2018-03 Standards Efficiency Review Retirements.	
4	September 17, 2020	Remanded by FERC (Order No. 873).	Withdrawn
5	February 4, 2021	Adopted by NERC Board of Trustees	Requirement R8 and associated elements restored in response

Version	Date	Action	Change Tracking
			to FERC Order No. 873.

A. Introduction

1. **Title:** Facility Ratings

2. **Number:** FAC-008-5

3. **Purpose:** To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits.

4. **Applicability:**

   4.1. Transmission Owner

   4.2. Generator Owner

5. **Effective Date:** See Implementation Plan.

B. Requirements and Measures

R1. Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facility(ies) up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up transformer. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

1.1. The documentation shall contain assumptions used to rate the generator and at least one of the following:

- Design or construction information such as design criteria, ratings provided by equipment manufacturers, equipment drawings and/or specifications, engineering analyses, method(s) consistent with industry standards (e.g. ANSI and IEEE), or an established engineering practice that has been verified by testing or engineering analysis.
- Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.

1.2. The documentation shall be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

M1. Each Generator Owner shall have documentation that shows how its Facility Ratings were determined as identified in Requirement 1.

R2. Each Generator Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner that contains all of the following. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

2.1. The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronic Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

2.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R2, Part 2.1 including identification of how each of the following were considered:

2.2.1. Equipment Rating standard(s) used in development of this methodology.

2.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

2.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

2.2.4. Operating limitations.[1]

2.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

2.4. The process by which the Rating of equipment that comprises a Facility is determined.

2.4.1. The scope of equipment addressed shall include, but not be limited to, conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

2.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M2. Each Generator Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 2, Parts 2.1 through 2.4.

R3. Each Transmission Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned Facilities (except for those generating unit Facilities addressed in R1 and R2) that contains all of the following: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

3.1. The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronics Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

[1] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

3.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R3, Part 3.1 including identification of how each of the following were considered:

3.2.1. Equipment Rating standard(s) used in development of this methodology.

3.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

3.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

3.2.4. Operating limitations.[2]

3.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

3.4. The process by which the Rating of equipment that comprises a Facility is determined.

3.4.1. The scope of equipment addressed shall include, but not be limited to, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

3.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M3. Each Transmission Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 3, Parts 3.1 through 3.4.

R4. Reserved.

M4. Reserved.

R5. Reserved.

M5. Reserved.

R6. Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

M6. Each Transmission Owner and Generator Owner shall have evidence to show that its Facility Ratings are consistent with the documentation for determining its Facility Ratings as specified in Requirement R1 or consistent with its Facility Ratings methodology as specified in Requirements R2 and R3 (Requirement R6).

R7. Reserved.

M7. Reserved.

[2] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

R8. Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center:

8.2.1. Identity of the existing next most limiting equipment of the Facility

8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

M8. Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R8.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority: "Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Compliance Monitoring and Enforcement Processes:

- Self-Certifications
- Spot Checking
- Compliance Audits
- Self-Reporting

- Compliance Violation Investigations
- Complaints

1.3. Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The Generator Owner shall keep its current documentation (for R1) and any modifications to the documentation that were in force since last compliance audit period for Measure M1 and Measure M6.
- The Generator Owner shall keep its current, in force Facility Ratings methodology (for R2) and any modifications to the methodology that were in force since last compliance audit period for Measure M2 and Measure M6.
- The Transmission Owner shall keep its current, in force Facility Ratings methodology (for R3) and any modifications to the methodology that were in force since the last compliance audit for Measure M3 and Measure M6.
- The Transmission Owner and Generator Owner shall keep its current, in force Facility Ratings and any changes to those ratings for three calendar years for Measure M6.
- The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
- If a Generator Owner or Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant.
- The Compliance Enforcement Authority shall keep the last audit and all subsequent compliance records.

1.4. Compliance Monitoring and Enforcement Program: As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.1.	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.2.	The Generator Owner failed to provide documentation for determining its Facility Ratings.
R2.	The Generator Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology did not address all the components of Requirement R2, Part 2.4. OR The Generator Owner failed to include in its Facility Rating Methodology, three of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in Requirement R2, Part 2.3 OR The Generator Owner failed to include in its Facility Rating Methodology four or more of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R3.	The Transmission Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology did not address either of the following Parts of Requirement R3: • 3.4.1 • 3.4.2 OR The Transmission Owner failed to include in its Facility Rating methodology three of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology failed to recognize a Facility's rating based on the most limiting component rating as required in Requirement R3, Part 3.3 OR The Transmission Owner failed to include in its Facility Rating methodology four or more of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4
R4. Reserved.				
R5. Reserved.				

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R6.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for 5% or less of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 5% or more, but less than up to (and including) 10% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 10% up to (and including) 15% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than15% of its solely owned and jointly owned Facilities. (R6)
R7. Reserved.				
R8.	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to and including 15 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 100%,	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 95%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 90%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 85% of the required Rating information to all of the

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
	but not less than or equal to 95% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but the information was provided up to and including 15 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 100%, but not less than or equal to 95% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 90% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more 15 calendar days but less than or equal to 25 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 95%, but not less than or equal to 90% of the required Rating information to the requesting entity. (R8, Part 8.2)	not less than or equal to 85% of the required Rating information to all of the requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 25 calendar days but less than or equal to 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 90%, but no less than or equal to 85% of the required Rating information to the requesting entity. (R8, Part 8.2)	requesting entities. (R8, Part 8.1) OR The responsible entity provided the required Rating information to the requesting entity, but did so more than 35 calendar days late. (R8, Part 8.2) OR The responsible entity provided less than 85 % of the required Rating information to the requesting entity. (R8, Part 8.2) OR The responsible entity failed to provide its Rating information to the requesting entity. (R8, Part 8.1)

D. Regional Variances

None.

E. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	Feb 7, 2006	Approved by Board of Trustees	New
1	Mar 16, 2007	Approved by FERC	New
2	May 12, 2010	Approved by Board of Trustees	Complete Revision, merging FAC_008-1 and FAC-009-1 under Project 2009-06 and address directives from Order 693
3	May 24, 2011	Addition of Requirement R8	Project 2009-06 Expansion to address third directive from Order 693
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3	November 17, 2011	FERC Order issued approving FAC-008-3	
3	May 17, 2012	FERC Order issued directing the VRF for Requirement R2 be changed from "Lower" to "Medium"	
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3	November 21, 2013	R4 and R5 and associated elements approved by FERC for retirement as part of the Paragraph 81 project (Project 2013-02)	
4	May 9, 2020	R7 and R8 and associated elements adopted by NERC Board of Trustees for retirement as part of Project 2018-03 Standards Efficiency Review Retirements.	
4	September 17, 2020	Remanded by FERC (Order No. 873).	Withdrawn
5	~~TBD~~February 4, 2021	Adopted by NERC Board of Trustees	Requirement R8 and associated elements restored in response

Version	Date	Action	Change Tracking
			to FERC Order No. 873.

A. Introduction

1. **Title:** Facility Ratings

2. **Number:** FAC-008-~~4~~5

3. **Purpose:** To ensure that Facility Ratings used in the reliable planning and operation of the Bulk Electric System (BES) are determined based on technically sound principles. A Facility Rating is essential for the determination of System Operating Limits.

4. **Applicability:**

   4.1. Transmission Owner

   4.2. Generator Owner

5. **Effective Date:** See Implementation Plan.

B. Requirements and Measures

R1. Each Generator Owner shall have documentation for determining the Facility Ratings of its solely and jointly owned generator Facility(ies) up to the low side terminals of the main step up transformer if the Generator Owner does not own the main step up transformer and the high side terminals of the main step up transformer if the Generator Owner owns the main step up transformer. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*

1.1. The documentation shall contain assumptions used to rate the generator and at least one of the following:

- Design or construction information such as design criteria, ratings provided by equipment manufacturers, equipment drawings and/or specifications, engineering analyses, method(s) consistent with industry standards (e.g. ANSI and IEEE), or an established engineering practice that has been verified by testing or engineering analysis.
- Operational information such as commissioning test results, performance testing or historical performance records, any of which may be supplemented by engineering analyses.

1.2. The documentation shall be consistent with the principle that the Facility Ratings do not exceed the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

M1. Each Generator Owner shall have documentation that shows how its Facility Ratings were determined as identified in Requirement 1.

R2. Each Generator Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned equipment connected between the location specified in R1 and the point of interconnection with the Transmission Owner that contains all of the following. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

2.1. The methodology used to establish the Ratings of the equipment that comprises the Facility(ies) shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronic Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

2.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R2, Part 2.1 including identification of how each of the following were considered:

2.2.1. Equipment Rating standard(s) used in development of this methodology.

2.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

2.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

2.2.4. Operating limitations.[1]

2.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

2.4. The process by which the Rating of equipment that comprises a Facility is determined.

2.4.1. The scope of equipment addressed shall include, but not be limited to, conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

2.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M2. Each Generator Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 2, Parts 2.1 through 2.4.

R3. Each Transmission Owner shall have a documented methodology for determining Facility Ratings (Facility Ratings methodology) of its solely and jointly owned Facilities (except for those generating unit Facilities addressed in R1 and R2) that contains all of the following: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

3.1. The methodology used to establish the Ratings of the equipment that comprises the Facility shall be consistent with at least one of the following:

- Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications such as nameplate rating.
- One or more industry standards developed through an open process such as Institute of Electrical and Electronics Engineers (IEEE) or International Council on Large Electric Systems (CIGRE).
- A practice that has been verified by testing, performance history or engineering analysis.

[1] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

3.2. The underlying assumptions, design criteria, and methods used to determine the Equipment Ratings identified in Requirement R3, Part 3.1 including identification of how each of the following were considered:

3.2.1. Equipment Rating standard(s) used in development of this methodology.

3.2.2. Ratings provided by equipment manufacturers or obtained from equipment manufacturer specifications.

3.2.3. Ambient conditions (for particular or average conditions or as they vary in real-time).

3.2.4. Operating limitations.[2]

3.3. A statement that a Facility Rating shall respect the most limiting applicable Equipment Rating of the individual equipment that comprises that Facility.

3.4. The process by which the Rating of equipment that comprises a Facility is determined.

3.4.1. The scope of equipment addressed shall include, but not be limited to, transmission conductors, transformers, relay protective devices, terminal equipment, and series and shunt compensation devices.

3.4.2. The scope of Ratings addressed shall include, as a minimum, both Normal and Emergency Ratings.

M3. Each Transmission Owner shall have a documented Facility Ratings methodology that includes all of the items identified in Requirement 3, Parts 3.1 through 3.4.

R4. Reserved.

M4. Reserved.

R5. Reserved.

M5. Reserved.

R6. Each Transmission Owner and Generator Owner shall have Facility Ratings for its solely and jointly owned Facilities that are consistent with the associated Facility Ratings methodology or documentation for determining its Facility Ratings. *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

M6. Each Transmission Owner and Generator Owner shall have evidence to show that its Facility Ratings are consistent with the documentation for determining its Facility Ratings as specified in Requirement R1 or consistent with its Facility Ratings methodology as specified in Requirements R2 and R3 (Requirement R6).

R7. Reserved.

M7. Reserved.

[2] Such as temporary de-ratings of impaired equipment in accordance with good utility practice.

R8. ~~Reserved.~~ Each Transmission Owner (and each Generator Owner subject to Requirement R2) shall provide requested information as specified below (for its solely and jointly owned Facilities that are existing Facilities, new Facilities, modifications to existing Facilities and re-ratings of existing Facilities) to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s): *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*

8.1. As scheduled by the requesting entities:

8.1.1. Facility Ratings

8.1.2. Identity of the most limiting equipment of the Facilities

8.2. Within 30 calendar days (or a later date if specified by the requester), for any requested Facility with a Thermal Rating that limits the use of Facilities under the requester's authority by causing any of the following: 1) An Interconnection Reliability Operating Limit, 2) A limitation of Total Transfer Capability, 3) An impediment to generator deliverability, or 4) An impediment to service to a major load center:

8.2.1. Identity of the existing next most limiting equipment of the Facility

8.2.2. The Thermal Rating for the next most limiting equipment identified in Requirement R8, Part 8.2.1.

M8. ~~Reserved.~~ Each Transmission Owner (and Generator Owner subject to Requirement R2) shall have evidence, such as a copy of a dated electronic note, or other comparable evidence to show that it provided its Facility Ratings and identity of limiting equipment to its associated Reliability Coordinator(s), Planning Coordinator(s), Transmission Planner(s), Transmission Owner(s) and Transmission Operator(s) in accordance with Requirement R8.

C. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority: "Compliance Enforcement Authority" means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

1.2. Compliance Monitoring and Enforcement Processes:

- Self-Certifications
- Spot Checking
- Compliance Audits

- Self-Reporting
- Compliance Violation Investigations
- Complaints

1.3. Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The Generator Owner shall keep its current documentation (for R1) and any modifications to the documentation that were in force since last compliance audit period for Measure M1 and Measure M6.
- The Generator Owner shall keep its current, in force Facility Ratings methodology (for R2) and any modifications to the methodology that were in force since last compliance audit period for Measure M2 and Measure M6.
- The Transmission Owner shall keep its current, in force Facility Ratings methodology (for R3) and any modifications to the methodology that were in force since the last compliance audit for Measure M3 and Measure M6.
- The Transmission Owner and Generator Owner shall keep its current, in force Facility Ratings and any changes to those ratings for three calendar years for Measure M6.
- The Transmission Owner (and Generator Owner that is subject to Requirement R2) shall keep evidence for Measure M8 for three calendar years.
- If a Generator Owner or Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant.
- The Compliance Enforcement Authority shall keep the last audit and all subsequent compliance records.

1.4. Compliance Monitoring and Enforcement Program: As defined in the NERC Rules of Procedure, "Compliance Monitoring and Enforcement Program" refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.1.	The Generator Owner's Facility Rating documentation did not address Requirement R1, Part 1.2.	The Generator Owner failed to provide documentation for determining its Facility Ratings.
R2.	The Generator Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology did not address all the components of Requirement R2, Part 2.4. OR The Generator Owner failed to include in its Facility Rating Methodology, three of the following Parts of Requirement R2: • 2.1. • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4	The Generator Owner's Facility Rating methodology failed to recognize a facility's rating based on the most limiting component rating as required in Requirement R2, Part 2.3 OR The Generator Owner failed to include in its Facility Rating Methodology four or more of the following Parts of Requirement R2: • 2.1 • 2.2.1 • 2.2.2 • 2.2.3 • 2.2.4

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R3.	The Transmission Owner failed to include in its Facility Rating methodology one of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner failed to include in its Facility Rating methodology two of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology did not address either of the following Parts of Requirement R3: • 3.4.1 • 3.4.2 OR The Transmission Owner failed to include in its Facility Rating methodology three of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4	The Transmission Owner's Facility Rating methodology failed to recognize a Facility's rating based on the most limiting component rating as required in Requirement R3, Part 3.3 OR The Transmission Owner failed to include in its Facility Rating methodology four or more of the following Parts of Requirement R3: • 3.1 • 3.2.1 • 3.2.2 • 3.2.3 • 3.2.4
R4. Reserved.				
R5. Reserved.				

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R6.	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for 5% or less of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 5% or more, but less than up to (and including) 10% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than 10% up to (and including) 15% of its solely owned and jointly owned Facilities. (R6)	The responsible entity failed to establish Facility Ratings consistent with the associated Facility Ratings methodology or documentation for determining the Facility Ratings for more than15% of its solely owned and jointly owned Facilities. (R6)
R7. Reserved.				
R8. ~~Reserved.~~	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by up to and including 15 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 100%,	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 15 calendar days but less than or equal to 25 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 95%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 25 calendar days but less than or equal to 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 90%, but	The responsible entity provided its Facility Ratings to all of the requesting entities but missed meeting the schedules by more than 35 calendar days. (R8, Part 8.1) OR The responsible entity provided less than 85% of the required Rating information to all of the

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D. Regional Variances

None.

E. Associated Documents

None.

Version History

Version	Date	Action	Change Tracking
1	Feb 7, 2006	Approved by Board of Trustees	New
1	Mar 16, 2007	Approved by FERC	New
2	May 12, 2010	Approved by Board of Trustees	Complete Revision, merging FAC_008-1 and FAC-009-1 under Project 2009-06 and address directives from Order 693
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4	~~TBD~~May 9, 2020	R7 and R8 and associated elements adopted by NERC Board of Trustees for retirement as part of Project 2018-03 Standards Efficiency Review Retirements.~~Adopted by NERC Board of Trustees~~	~~R7 and R8 and associated elements approved by NERC Board of Trustees for retirement as part of Project 2018-03 Standard Efficiency Review Retirements~~
4	September 17, 2020	Remanded by FERC (Order No. 873).	Withdrawn

Version	Date	Action	Change Tracking
5	February 4, 2021	Adopted by NERC Board of Trustees	Requirement R8 and associated elements restored in response to FERC Order No. 873.

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Implementation Plan

Project 2018-03 Standards Efficiency Review Retirements
Reliability Standard FAC-008-5

Applicable Standard(s)

- FAC-008-5 – Facility Ratings

Requested Retirement(s)

- FAC-008-3 – Facility Ratings

Applicable Entities

- Transmission Owner
- Generator Owner

Background

In 2017, NERC initiated the Standards Efficiency Review (SER). The scope of this project was to use a risk-based approach to identify potential efficiencies through retirement of Reliability Standard requirements. Following the completion of the first phase of work, the SER Standard Drafting Team (SDT) submitted a Standards Authorization Request (SAR) to the NERC Standards Committee, which the Standards Committee accepted in August 2018.

Project 2018-03 Standards Efficiency Review Retirements was initiated to consider and implement the recommendations for Reliability Standard retirements contained in the SAR.
Among other things, the SER SDT proposed retiring Requirements R7 and R8 in Reliability Standard FAC-008-3 as redundant and not needed for reliability. Proposed Reliability Standard FAC-008-4 passed final ballot on May 2, 2019; was adopted by the Board of Trustees on May 9, 2019; and was filed with the Federal Energy Regulatory Commission (FERC) on June 7, 2019 for approval.

On September 17, 2020, the Federal Regulatory Commission (FERC) issued Order No. 873.[1] With respect to proposed Reliability Standard FAC-008-4, FERC determined that the retirement of Requirement R7 would be appropriate, but rejected the retirement of Requirement R8, concluding that "… Requirement R8 is needed to ensure that limiting and next limiting equipment is identified and communicated" (P 40). FERC remanded proposed Reliability Standard FAC-008-4 to NERC for further consideration.

[1] Order No. 873, *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review*, 172 FERC ¶ 61,225 (2020), https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20on%20SER%20Retirements.pdf.

Following the FERC remand, NERC submitted a notice to the remaining applicable governmental authorities requesting that FAC-008-4 be withdrawn in their respective jurisdictions.

Proposed Reliability Standard FAC-008-5 would retire Requirement R7 of currently effective Reliability Standard FAC-008-3.

General Considerations

For Reliability Standard FAC-008-5– Facility Ratings, the standard will become effective on the first day of the first calendar quarter that is three (3) months after applicable regulatory approval. This implementation timeframe reflects consideration that entities may need time to update their internal systems and documentation to reflect the new standard version numbers.

Effective Date

Reliability Standard FAC-008-5– Facility Ratings

Where approval by an applicable governmental authority is required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Retirement Date

Reliability Standard FAC-008-3 – Facility Ratings

Reliability Standard FAC-008-3 shall be retired immediately prior to the effective date of the revised standard in the particular jurisdiction in which the revised standard is becoming effective.

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Implementation Plan

Project 2018-03 Standards Efficiency Review Retirements
Reliability Standard FAC-008-5

Applicable Standard(s)

- FAC-008-5 – Facility Ratings

Requested Retirement(s)

- FAC-008-3 – Facility Ratings

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- Transmission Owner
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Project 2018-03 Standards Efficiency Review Retirements was initiated to consider and implement the recommendations for Reliability Standard retirements contained in the SAR.
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[1] Order No. 873, *Electric Reliability Organization Proposal to Retire Requirements in Reliability Standards Under the NERC Standards Efficiency Review*, 172 FERC ¶ 61,225 (2020), https://www.nerc.com/FilingsOrders/us/FERCOrdersRules/Order%20on%20SER%20Retirements.pdf.

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Proposed Reliability Standard FAC-008-5 would retire Requirement R7 of currently effective Reliability Standard FAC-008-3.

General Considerations

For Reliability Standard FAC-008-5– Facility Ratings, the standard will become effective on the first day of the first calendar quarter that is three (3) months after applicable regulatory approval. This implementation timeframe reflects consideration that entities may need time to update their internal systems and documentation to reflect the new standard version numbers.

Effective Date

Reliability Standard FAC-008-5– Facility Ratings

Where approval by an applicable governmental authority is required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the effective date of the applicable governmental authority's order approving the standard, or as otherwise provided for by the applicable governmental authority.

Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is three (3) months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

Retirement Date

Reliability Standard FAC-008-3 – Facility Ratings

Reliability Standard FAC-008-3 shall be retired immediately prior to the effective date of the revised standard in the particular jurisdiction in which the revised standard is becoming effective.

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Violation Risk Factor and Violation Severity Level Justifications

Project 2018-03 Standards Efficiency Review Retirements

This document provides the standard drafting team's (SDT's) justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in proposed Reliability Standard FAC-008-5. Each requirement is assigned a VRF and a VSL. These elements support the determination of an initial value range for the Base Penalty Amount regarding violations of requirements in FERC-approved Reliability Standards, as defined in the Electric Reliability Organizations (ERO) Sanction Guidelines. The SDT applied the following NERC criteria and FERC Guidelines when developing the VRFs and VSLs for the requirements.

NERC Criteria for Violation Risk Factors

High Risk Requirement

A requirement that, if violated, could directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

Medium Risk Requirement

A requirement that, if violated, could directly affect the electrical state or the capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System. However, violation of a medium risk requirement is unlikely to lead to Bulk Electric System instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to Bulk Electric System instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

Lower Risk Requirement

A requirement that is administrative in nature and a requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor and control the Bulk Electric System; or, a requirement that is administrative in nature and a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the Bulk Electric System, or the ability to effectively monitor, control, or restore the Bulk Electric System.

FERC Guidelines for Violation Risk Factors

Guideline (1) – Consistency with the Conclusions of the Final Blackout Report

FERC seeks to ensure that VRFs assigned to Requirements of Reliability Standards in these identified areas appropriately reflect their historical critical impact on the reliability of the Bulk-Power System. In the VSL Order, FERC listed critical areas (from the Final Blackout Report) where violations could severely affect the reliability of the Bulk-Power System:

- Emergency operations
- Vegetation management
- Operator personnel training
- Protection systems and their coordination
- Operating tools and backup facilities
- Reactive power and voltage control
- System modeling and data exchange
- Communication protocol and facilities
- Requirements to determine equipment ratings
- Synchronized data recorders
- Clearer criteria for operationally critical facilities
- Appropriate use of transmission loading relief.

Guideline (2) – Consistency within a Reliability Standard

FERC expects a rational connection between the sub-Requirement VRF assignments and the main Requirement VRF assignment.

Guideline (3) – Consistency among Reliability Standards

FERC expects the assignment of VRFs corresponding to Requirements that address similar reliability goals in different Reliability Standards would be treated comparably.

Guideline (4) – Consistency with NERC's Definition of the Violation Risk Factor Level

Guideline (4) was developed to evaluate whether the assignment of a particular VRF level conforms to NERC's definition of that risk level.

Guideline (5) – Treatment of Requirements that Co-mingle More Than One Obligation

Where a single Requirement co-mingles a higher risk reliability objective and a lesser risk reliability objective, the VRF assignment for such Requirements must not be watered down to reflect the lower risk level associated with the less important objective of the Reliability Standard.

NERC Criteria for Violation Severity Levels

VSLs define the degree to which compliance with a requirement was not achieved. Each requirement must have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs.

VSLs should be based on NERC's overarching criteria shown in the table below:

Lower VSL	Moderate VSL	High VSL	Severe VSL
The performance or product measured almost meets the full intent of the requirement.	The performance or product measured meets the majority of the intent of the requirement.	The performance or product measured does not meet the majority of the intent of the requirement, but does meet some of the intent.	The performance or product measured does not substantively meet the intent of the requirement.

FERC Order of Violation Severity Levels

The FERC VSL guidelines are presented below, followed by an analysis of whether the VSLs proposed for each requirement in the standard meet the FERC Guidelines for assessing VSLs:

Guideline (1) – Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance

Compare the VSLs to any prior levels of non-compliance and avoid significant changes that may encourage a lower level of compliance than was required when levels of non-compliance were used.

Guideline (2) – Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties

A violation of a "binary" type requirement must be a "Severe" VSL.
Do not use ambiguous terms such as "minor" and "significant" to describe noncompliant performance.

Guideline (3) – Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement

VSLs should not expand on what is required in the requirement.

Guideline (4) – Violation Severity Level Assignment Should Be Based on a Single Violation, Not on a Cumulative Number of Violations

Unless otherwise stated in the requirement, each instance of non-compliance with a requirement is a separate violation. Section 4 of the Sanction Guidelines states that assessing penalties on a per violation per day basis is the "default" for penalty calculations.

VRF Justification for FAC-008-5, Requirement R1

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R2

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R3

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R6

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R8

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R1

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R2

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R3

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R6

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R8

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

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Violation Risk Factor and Violation Severity Level Justifications

Project 2018-03 Standards Efficiency Review Retirements

This document provides the standard drafting team's (SDT's) justification for assignment of violation risk factors (VRFs) and violation severity levels (VSLs) for each requirement in proposed Reliability Standard FAC-008-5. Each requirement is assigned a VRF and a VSL. These elements support the determination of an initial value range for the Base Penalty Amount regarding violations of requirements in FERC-approved Reliability Standards, as defined in the Electric Reliability Organizations (ERO) Sanction Guidelines. The SDT applied the following NERC criteria and FERC Guidelines when developing the VRFs and VSLs for the requirements.

NERC Criteria for Violation Risk Factors

High Risk Requirement

A requirement that, if violated, could directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures; or, a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to Bulk Electric System instability, separation, or a cascading sequence of failures, or could place the Bulk Electric System at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

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FERC Guidelines for Violation Risk Factors

Guideline (1) – Consistency with the Conclusions of the Final Blackout Report

FERC seeks to ensure that VRFs assigned to Requirements of Reliability Standards in these identified areas appropriately reflect their historical critical impact on the reliability of the Bulk-Power System. In the VSL Order, FERC listed critical areas (from the Final Blackout Report) where violations could severely affect the reliability of the Bulk-Power System:

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- Requirements to determine equipment ratings
- Synchronized data recorders
- Clearer criteria for operationally critical facilities
- Appropriate use of transmission loading relief.

Guideline (2) – Consistency within a Reliability Standard

FERC expects a rational connection between the sub-Requirement VRF assignments and the main Requirement VRF assignment.

Guideline (3) – Consistency among Reliability Standards

FERC expects the assignment of VRFs corresponding to Requirements that address similar reliability goals in different Reliability Standards would be treated comparably.

Guideline (4) – Consistency with NERC's Definition of the Violation Risk Factor Level

Guideline (4) was developed to evaluate whether the assignment of a particular VRF level conforms to NERC's definition of that risk level.

Guideline (5) – Treatment of Requirements that Co-mingle More Than One Obligation

Where a single Requirement co-mingles a higher risk reliability objective and a lesser risk reliability objective, the VRF assignment for such Requirements must not be watered down to reflect the lower risk level associated with the less important objective of the Reliability Standard.

NERC Criteria for Violation Severity Levels

VSLs define the degree to which compliance with a requirement was not achieved. Each requirement must have at least one VSL. While it is preferable to have four VSLs for each requirement, some requirements do not have multiple "degrees" of noncompliant performance and may have only one, two, or three VSLs.

VSLs should be based on NERC's overarching criteria shown in the table below:

Lower VSL	Moderate VSL	High VSL	Severe VSL
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FERC Order of Violation Severity Levels

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Guideline (1) – Violation Severity Level Assignments Should Not Have the Unintended Consequence of Lowering the Current Level of Compliance

Compare the VSLs to any prior levels of non-compliance and avoid significant changes that may encourage a lower level of compliance than was required when levels of non-compliance were used.

Guideline (2) – Violation Severity Level Assignments Should Ensure Uniformity and Consistency in the Determination of Penalties

A violation of a "binary" type requirement must be a "Severe" VSL.
Do not use ambiguous terms such as "minor" and "significant" to describe noncompliant performance.

Guideline (3) – Violation Severity Level Assignment Should Be Consistent with the Corresponding Requirement

VSLs should not expand on what is required in the requirement.

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VRF Justification for FAC-008-5, Requirement R1

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R2

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R3

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R6

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VRF Justification for FAC-008-5, Requirement R8

The VRF did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R1

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R2

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R3

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R6

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

VSL Justification for FAC-008-5, Requirement R8

The VSL did not change from the previously FERC approved FAC-008-3 Reliability Standard.

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Standards Announcement

Project 2018-03 Standards Efficiency Review Retirements

Final Ballot Open through January 28, 2021

Now Available

The 10-day final ballot for **Project 2018-03 Standards Efficiency Review Retirements FAC-008-5 – Facility Ratings** is open through **8 p.m. Eastern, Thursday, January 28, 2021.**

Balloting

In the final ballot, votes are counted by exception. Votes from the previous ballot are automatically carried over in the final ballot. Only members of the applicable ballot pools can cast a vote. Ballot pool members who previously voted have the option to change their vote in the final ballot. Ballot pool members who did not cast a vote during the previous ballot can vote in the final ballot.

Members of the ballot pool associated with this project can log in and submit votes by accessing the Standards Balloting and Commenting System (SBS). Contact Wendy Muller regarding issues using the SBS.

- *Contact NERC IT support directly at https://support.nerc.net/ (Monday – Friday, 8 a.m. - 5 p.m. Eastern) for problems regarding accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out.*
- *Passwords expire every **6 months** and must be reset.*
- *The SBS **is not** supported for use on mobile devices.*
- *Please be mindful of ballot and comment period closing dates. We ask to **allow at least 48 hours** for NERC support staff to assist with inquiries. Therefore, it is recommended that users try logging into their SBS accounts **prior to the last day** of a comment/ballot period.*

Next Steps

The voting results will be posted and announced after the ballot closes. If approved, the standard will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

For information on the Standards Development Process, refer to the Standard Processes Manual**.**

For more information or assistance, contact Standards Developer, Laura Anderson (via email) or at (404) 446-9671.

North American Electric Reliability Corporation
3353 Peachtree Rd, NE
Suite 600, North Tower
Atlanta, GA 30326
404-446-2560 | www.nerc.com

BALLOT RESULTS

Ballot Name: 2018-03 Standards Efficiency Review Retirements FAC-008-5 FN 2 ST
Voting Start Date: 1/19/2021 11:02:33 AM
Voting End Date: 1/28/2021 8:00:00 PM
Ballot Type: ST
Ballot Activity: FN
Ballot Series: 2
Total # Votes: 244
Total Ballot Pool: 268
Quorum: 91.04
Quorum Established Date: 1/19/2021 11:39:36 AM
Weighted Segment Value: 95.96

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	69	1	61	0.953	3	0.047	0	1	4
Segment: 2	8	0.6	6	0.6	0	0	0	1	1
Segment: 3	62	1	55	0.982	1	0.018	0	0	6
Segment: 4	15	1	12	0.923	1	0.077	0	0	2
Segment: 5	68	1	58	0.951	3	0.049	0	0	7
Segment: 6	41	1	34	0.944	2	0.056	0	1	4
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	1	0.1	1	0.1	0	0	0	0	0
Segment: 9	0	0	0	0	0	0	0	0	0
Segment: 10	4	0.4	4	0.4	0	0	0	0	0

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Totals:	268	6.1	231	5.854	10	0.246	0	3	24

BALLOT POOL MEMBERS

Show All entries Search: Search

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	AEP - AEP Service Corporation	Dennis Sauriol		Affirmative	N/A
1	Ameren - Ameren Services	Tamara Evey		None	N/A
1	APS - Arizona Public Service Co.	Daniela Atanasovski		Affirmative	N/A
1	Arizona Electric Power Cooperative, Inc.	Jennifer Bray		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Mark Riley		Affirmative	N/A
1	Austin Energy	Thomas Standifur		Affirmative	N/A
1	Avista - Avista Corporation	Mike Magruder		None	N/A
1	Balancing Authority of Northern California	Kevin Smith	Joe Tarantino	Negative	N/A
1	Basin Electric Power Cooperative	David Rudolph		Affirmative	N/A
1	BC Hydro and Power Authority	Adrian Andreoiu		Affirmative	N/A
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Bonneville Power Administration	Kammy Rogers-Holliday		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	Daniela Hammons		Affirmative	N/A
1	Cleco Corporation	John Lindsey		Affirmative	N/A
1	Dairyland Power Cooperative	Renee Leidel		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Candace Marshall		None	N/A
1	Duke Energy	Laura Lee		Affirmative	N/A
1	Edison International - Southern California Edison Company	Jose Avendano Mora		Affirmative	N/A
1	Entergy - Entergy Services, Inc.	Oliver Burke		Affirmative	N/A
1	Evergy	Allen Klassen	Douglas Webb	Affirmative	N/A
1	Eversource Energy	Quintin Lee		Affirmative	N/A
1	Exelon	Daniel Gacek		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	Julie Severino		Affirmative	N/A
1	Georgia Transmission Corporation	Greg Davis		Affirmative	N/A
1	Great River Energy	Gordon Pietsch		Affirmative	N/A
1	Hydro One Networks, Inc.	Payam Farahbakhsh		Affirmative	N/A
1	Hydro-Qu?bec TransEnergie	Nicolas Turcotte		Affirmative	N/A
1	IDACORP - Idaho Power Company	Laura Nelson		Affirmative	N/A
1	Imperial Irrigation District	Jesus Sammy Alcaraz	Denise Sanchez	Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Allie Gavin	Abstain	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	JEA	Joe McClung		Negative	N/A
1	KAMO Electric Cooperative	Micah Breedlove		Affirmative	N/A
1	Los Angeles Department of Water and Power	faranak sarbaz		Affirmative	N/A
1	Lower Colorado River Authority	James Baldwin		Affirmative	N/A
1	Manitoba Hydro	Bruce Reimer		Affirmative	N/A
1	MEAG Power	David Weekley	Scott Miller	Affirmative	N/A
1	Minnkota Power Cooperative Inc.	Theresa Allard	Andy Fuhrman	Affirmative	N/A
1	Muscatine Power and Water	Andy Kurriger		Affirmative	N/A
1	N.W. Electric Power Cooperative, Inc.	Mark Ramsey		Affirmative	N/A
1	National Grid USA	Michael Jones		Affirmative	N/A
1	NB Power Corporation	Nurul Abser		Affirmative	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
1	New York Power Authority	Salvatore Spagnolo		Affirmative	N/A
1	NextEra Energy - Florida Power and Light Co.	Mike ONeil		Affirmative	N/A
1	NiSource - Northern Indiana Public Service Co.	Steve Toosevich		Affirmative	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Affirmative	N/A
1	Omaha Public Power District	Doug Peterchuck		Affirmative	N/A
1	Oncor Electric Delivery	Lee Maurer	Tammy Porter	Affirmative	N/A
1	Orlando Utilities Commission	Aaron Staley		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	OTP - Otter Tail Power Company	Charles Wicklund		Affirmative	N/A
1	Pacific Gas and Electric Company	Marco Rios		None	N/A
1	Platte River Power Authority	Matt Thompson		Negative	N/A
1	PPL Electric Utilities Corporation	Preston Walker		Affirmative	N/A
1	PSEG - Public Service Electric and Gas Co.	Randhir Singh		Affirmative	N/A
1	Public Utility District No. 1 of Chelan County	Ginette Lacasse		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Alyssia Rhoads		Affirmative	N/A
1	Salt River Project	Chris Hofmann		Affirmative	N/A
1	Santee Cooper	Chris Wagner		Affirmative	N/A
1	SaskPower	Wayne Guttormson		Affirmative	N/A
1	Seattle City Light	Michael Jang		Affirmative	N/A
1	Seminole Electric Cooperative, Inc.	Bret Galbraith		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Matt Carden		Affirmative	N/A
1	Sunflower Electric Power Corporation	Paul Mehlhaff		Affirmative	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell	Jennie Wike	Affirmative	N/A
1	Tennessee Valley Authority	Gabe Kurtz		Affirmative	N/A
1	Tri-State G and T Association, Inc.	Kjersti Drott		Affirmative	N/A
1	U.S. Bureau of Reclamation	Richard Jackson		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Western Area Power Administration	sean erickson		Affirmative	N/A
1	Xcel Energy, Inc.	Dean Schiro		Affirmative	N/A
2	California ISO	Jamie Johnson		Abstain	N/A
2	Electric Reliability Council of Texas, Inc.	Brandon Gleason		Affirmative	N/A
2	Independent Electricity System Operator	Leonard Kula		None	N/A
2	ISO New England, Inc.	Michael Puscas		Affirmative	N/A
2	Midcontinent ISO, Inc.	Bobbi Welch		Affirmative	N/A
2	New York Independent System Operator	Gregory Campoli		Affirmative	N/A
2	PJM Interconnection, L.L.C.	Tom Foster	Elizabeth Davis	Affirmative	N/A
2	Southwest Power Pool, Inc. (RTO)	Charles Yeung		Affirmative	N/A
3	AEP	Kent Feliks		Affirmative	N/A
3	AES - Indianapolis Power and Light Co.	Colleen Campbell		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras		Affirmative	N/A
3	APS - Arizona Public Service Co.	Jessica Lopez		Affirmative	N/A
3	Austin Energy	W. Dwayne Preston		Affirmative	N/A
3	Avista - Avista Corporation	Scott Kinney		Affirmative	N/A
3	Basin Electric Power Cooperative	Jeremy Voll		Affirmative	N/A
3	BC Hydro and Power Authority	Hootan Jarollahi		Affirmative	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Darnez Gresham		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Black Hills Corporation	Don Stahl		Affirmative	N/A
3	Bonneville Power Administration	Ken Lanehome		Affirmative	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
3	Cleco Corporation	Maurice Paulk		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs Utilities	Hillary Dobson		Affirmative	N/A
3	Dominion - Dominion Resources, Inc.	Connie Lowe		Affirmative	N/A
3	DTE Energy - Detroit Edison Company	Karie Barczak		Affirmative	N/A
3	Duke Energy	Lee Schuster		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Evergy	Marcus Moor	Douglas Webb	Affirmative	N/A
3	Eversource Energy	Christopher McKinnon		Affirmative	N/A
3	Exelon	Kinte Whitehead		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Aaron Ghodooshim		Affirmative	N/A
3	Florida Municipal Power Agency	Dale Ray	Truong Le	Affirmative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Great River Energy	Michael Brytowski		Affirmative	N/A
3	Imperial Irrigation District	Glen Allegranza	Denise Sanchez	Affirmative	N/A
3	JEA	Garry Baker		None	N/A
3	KAMO Electric Cooperative	Tony Gott		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	Lakeland Electric	Patricia Boody		None	N/A
3	Lincoln Electric System	Jason Fortik		Affirmative	N/A
3	Los Angeles Department of Water and Power	Tony Skourtas		Affirmative	N/A
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A
3	Manitoba Hydro	Karim Abdel-Hadi		Affirmative	N/A
3	MEAG Power	Roger Brand	Scott Miller	Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
3	New York Power Authority	David Rivera		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Steven Taddeucci		Affirmative	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		None	N/A
3	NW Electric Power Cooperative, Inc.	John Stickley		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Affirmative	N/A
3	OTP - Otter Tail Power Company	Wendi Olson		Affirmative	N/A
3	Owensboro Municipal Utilities	Thomas Lyons		Affirmative	N/A
3	Platte River Power Authority	Wade Kiess		Negative	N/A
3	Portland General Electric Co.	Dan Zollner		None	N/A
3	PPL - Louisville Gas and Electric Co.	James Frank		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
3	PSEG - Public Service Electric and Gas Co.	maria pardo		Affirmative	N/A
3	Public Utility District No. 1 of Chelan County	Joyce Gundry		Affirmative	N/A
3	Puget Sound Energy, Inc.	Tim Womack		None	N/A
3	Santee Cooper	James Poston		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	Jeremy Lorigan		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jarrod Murdaugh		Affirmative	N/A
3	Snohomish County PUD No. 1	Holly Chaney		Affirmative	N/A
3	Southern Company - Alabama Power Company	Joel Dembowski		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	Marc Donaldson	Jennie Wike	Affirmative	N/A
3	TECO - Tampa Electric Co.	Ronald Donahey		None	N/A
3	Tennessee Valley Authority	Ian Grant		Affirmative	N/A
3	Tri-State G and T Association, Inc.	Janelle Marriott Gill		Affirmative	N/A
3	WEC Energy Group, Inc.	Thomas Breene		Affirmative	N/A
3	Xcel Energy, Inc.	Nicholas Friebel		Affirmative	N/A
4	Alliant Energy Corporation Services, Inc.	Larry Heckert		Affirmative	N/A
4	Austin Energy	Jun Hua		Affirmative	N/A
4	City Utilities of Springfield, Missouri	John Allen		Affirmative	N/A
4	CMS Energy - Consumers Energy Company	Aric Root		Affirmative	N/A
4	FirstEnergy - FirstEnergy Corporation	Mark Garza		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
4	Florida Municipal Power Agency	Carol Chinn	Truong Le	Affirmative	N/A
4	LaGen	Wayne Messina		None	N/A
4	MGE Energy - Madison Gas and Electric Co.	Joseph DePoorter		Affirmative	N/A
4	Modesto Irrigation District	Spencer Tacke		None	N/A
4	Public Utility District No. 1 of Snohomish County	John Martinsen		Affirmative	N/A
4	Public Utility District No. 2 of Grant County, Washington	Karla Weaver		Affirmative	N/A
4	Sacramento Municipal Utility District	Foung Mua	Joe Tarantino	Negative	N/A
4	Seattle City Light	Hao Li		Affirmative	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho	Jennie Wike	Affirmative	N/A
4	WEC Energy Group, Inc.	Matthew Beilfuss		Affirmative	N/A
5	Acciona Energy North America	George Brown		Affirmative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		Affirmative	N/A
5	APS - Arizona Public Service Co.	Kelsi Rigby		Affirmative	N/A
5	Austin Energy	Michael Dillard		Affirmative	N/A
5	Avista - Avista Corporation	Glen Farmer		Affirmative	N/A
5	Basin Electric Power Cooperative	Colleen Peterson		Affirmative	N/A
5	BC Hydro and Power Authority	Helen Hamilton Harding		Affirmative	N/A
5	Berkshire Hathaway - NV Energy	Kevin Salsbury		Affirmative	N/A
5	Black Hills Corporation	Derek Silbaugh		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Boise-Kuna Irrigation District - Lucky Peak Power Plant Project	Mike Kukla		Affirmative	N/A
5	Bonneville Power Administration	Scott Winner		Affirmative	N/A
5	Brazos Electric Power Cooperative, Inc.	Shari Heino		None	N/A
5	Cleco Corporation	Stephanie Huffman		None	N/A
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Affirmative	N/A
5	Colorado Springs Utilities	Jeff Icke		None	N/A
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Rachel Snead		None	N/A
5	DTE Energy - Detroit Edison Company	Adrian Raducea		None	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
5	Edison International - Southern California Edison Company	Neil Shockey		Affirmative	N/A
5	Entergy	Jamie Prater		Affirmative	N/A
5	Evergy	Derek Brown	Douglas Webb	Affirmative	N/A
5	Exelon	Cynthia Lee		Affirmative	N/A
5	FirstEnergy - FirstEnergy Corporation	Robert Loy		Affirmative	N/A
5	Florida Municipal Power Agency	Chris Gowder	Truong Le	Affirmative	N/A
5	Great River Energy	Jacalynn Bentz		Affirmative	N/A
5	Herb Schrayshuen	Herb Schrayshuen		Affirmative	N/A
5	Hydro-Qu?bec Production	Carl Pineault		Affirmative	N/A
5	Imperial Irrigation District	Tino Zaragoza	Denise Sanchez	Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	JEA	John Babik		Negative	N/A
5	Lincoln Electric System	Kayleigh Wilkerson		Affirmative	N/A
5	Los Angeles Department of Water and Power	Glenn Barry		Affirmative	N/A
5	Lower Colorado River Authority	Teresa Cantwell		Affirmative	N/A
5	Manitoba Hydro	Yuguang Xiao		Affirmative	N/A
5	Massachusetts Municipal Wholesale Electric Company	Anthony Stevens		Affirmative	N/A
5	Muscatine Power and Water	Neal Nelson		Affirmative	N/A
5	National Grid USA	Elizabeth Spivak		Affirmative	N/A
5	NB Power Corporation	Rob Vance		Affirmative	N/A
5	New York Power Authority	Shivaz Chopra		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Kathryn Tackett		Affirmative	N/A
5	NovaSource Power Services	Bradley Collard		None	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Patrick Wells		Affirmative	N/A
5	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
5	Omaha Public Power District	Mahmood Safi		Affirmative	N/A
5	Ontario Power Generation Inc.	Constantin Chitescu		Affirmative	N/A
5	Orlando Utilities Commission	Dania Colon		Affirmative	N/A
5	OTP - Otter Tail Power Company	Brett Jacobs		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Pacific Gas and Electric Company	Ed Hanson		Affirmative	N/A
5	Platte River Power Authority	Tyson Archie		Negative	N/A
5	Portland General Electric Co.	Ryan Olson		None	N/A
5	PPL - Louisville Gas and Electric Co.	JULIE HOSTRANDER		Affirmative	N/A
5	PSEG - PSEG Fossil LLC	Tim Kucey		Affirmative	N/A
5	Public Utility District No. 1 of Chelan County	Meaghan Connell		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Sam Nietfeld		Affirmative	N/A
5	Public Utility District No. 2 of Grant County, Washington	Amy Jones		Affirmative	N/A
5	Sacramento Municipal Utility District	Nicole Goi	Joe Tarantino	Negative	N/A
5	Salt River Project	Kevin Nielsen		Affirmative	N/A
5	Santee Cooper	Tommy Curtis		Affirmative	N/A
5	Seattle City Light	Faz Kasraie		Affirmative	N/A
5	Seminole Electric Cooperative, Inc.	Mickey Bellard		Affirmative	N/A
5	Southern Company - Southern Company Generation	James Howell		Affirmative	N/A
5	Talen Generation, LLC	Donald Lock		Affirmative	N/A
5	Tennessee Valley Authority	M Lee Thomas		Affirmative	N/A
5	Tri-State G and T Association, Inc.	Ryan Walter		Affirmative	N/A
5	U.S. Bureau of Reclamation	Wendy Center		Affirmative	N/A
5	WEC Energy Group, Inc.	Janet OBrien		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
5	Xcel Energy, Inc.	Gerry Huitt		Affirmative	N/A
6	AEP	JT Kuehne		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		Affirmative	N/A
6	APS - Arizona Public Service Co.	Marcus Bortman		Affirmative	N/A
6	Associated Electric Cooperative, Inc.	Brian Ackermann		None	N/A
6	Austin Energy	Tammy Cooper		Affirmative	N/A
6	Basin Electric Power Cooperative	Jerry Horner		Affirmative	N/A
6	Black Hills Corporation	Brooke Voorhees		Affirmative	N/A
6	Bonneville Power Administration	Andrew Meyers		Affirmative	N/A
6	Cleco Corporation	Robert Hirchak		Affirmative	N/A
6	Dominion - Dominion Resources, Inc.	Sean Bodkin		None	N/A
6	Duke Energy	Greg Cecil		Affirmative	N/A
6	Evergy	Thomas ROBBEN	Douglas Webb	Affirmative	N/A
6	Exelon	Becky Webb		Affirmative	N/A
6	FirstEnergy - FirstEnergy Corporation	Ann Carey		Affirmative	N/A
6	Florida Municipal Power Agency	Richard Montgomery	Truong Le	Affirmative	N/A
6	Imperial Irrigation District	Diana Torres	Denise Sanchez	Affirmative	N/A
6	Los Angeles Department of Water and Power	Anton Vu		Affirmative	N/A
6	Manitoba Hydro	Blair Mukanik		Affirmative	N/A
6	Muscatine Power and Water	Nick Burns		Affirmative	N/A
6	New York Power Authority	Erick Barrios		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	NextEra Energy - Florida Power and Light Co.	Justin Welty		None	N/A
6	NiSource - Northern Indiana Public Service Co.	Joe O'Brien		Affirmative	N/A
6	Northern California Power Agency	Dennis Sismaet		Abstain	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Sing Tay		Affirmative	N/A
6	Omaha Public Power District	Shonda McCain		Affirmative	N/A
6	Platte River Power Authority	Sabrina Martz		Negative	N/A
6	Portland General Electric Co.	Daniel Mason		Affirmative	N/A
6	Powerex Corporation	Gordon Dobson-Mack		None	N/A
6	PPL - Louisville Gas and Electric Co.	Linn Oelker		Affirmative	N/A
6	PSEG - PSEG Energy Resources and Trade LLC	Joseph Neglia		Affirmative	N/A
6	Public Utility District No. 1 of Chelan County	Glen Pruitt		Affirmative	N/A
6	Public Utility District No. 2 of Grant County, Washington	LeRoy Patterson		Affirmative	N/A
6	Sacramento Municipal Utility District	Charles Norton	Joe Tarantino	Negative	N/A
6	Santee Cooper	Marty Watson		Affirmative	N/A
6	Seattle City Light	Brian Belger		Affirmative	N/A
6	Snohomish County PUD No. 1	John Liang		Affirmative	N/A
6	Southern Company - Southern Company Generation	Ron Carlsen		Affirmative	N/A

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
6	Tacoma Public Utilities (Tacoma, WA)	Terry Gifford	Jennie Wike	Affirmative	N/A
6	Tennessee Valley Authority	Marjorie Parsons		Affirmative	N/A
6	WEC Energy Group, Inc.	David Hathaway		Affirmative	N/A
6	Xcel Energy, Inc.	Carrie Dixon		Affirmative	N/A
8	David Kiguel	David Kiguel		Affirmative	N/A
10	New York State Reliability Council	ALAN ADAMSON		Affirmative	N/A
10	Northeast Power Coordinating Council	Guy V. Zito		Affirmative	N/A
10	ReliabilityFirst	Anthony Jablonski		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A

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NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Exhibit F

Standard Drafting Team Roster

NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Standard Drafting Team Roster

Project 2018-03 Standards Efficiency Review Retirements

	Name	Entity
Chair	Charles Rogers	Consumers Energy
Vice Chair	Bob Staton	Public Service Company of Colorado (Xcel Energy)
Members	Karie Barczak	DTE Energy
	Sandeep Borkar	ERCOT
	Gerald Keenan	NWPP
	Mario Kiresich	Southern California Edison
	Thomas Leslie	Georgia Transmission Corp.
	Michael Steckelberg	Great River Energy
	Stephen Wendling	American Transmission Company
	Jim Williams	SPP
PMOS Liaisons	Michael Brytowski	Great River Energy
	Mark Pratt	Southern Company
NERC Staff	Laura Anderson – Standards Developer	North American Electric Reliability Corporation
	Darrel Richardson – Principal Technical Advisor	North American Electric Reliability Corporation
	Scott Barfield – Senior Technical Advisor	North American Electric Reliability Corporation
	Al McMeekin – Senior Technical Advisor	North American Electric Reliability Corporation
	Lauren Perotti – Counsel	North American Electric Reliability Corporation
	Wendy Muller – Specialist, Standards Development	North American Electric Reliability Corporation