Avis du NPCC sur l'impact du nouveau champ d'application de la norme FAC-002-4 (version anglaise)

NPCC

1040 Avenue of the Americas, 4th Floor
New York, NY 10018
www.npcc.org

FAC-001 and FAC-002 Applicability

NPCC Response

October 3, 2025

BACKGROUND

On September 22, 2025, Hydro-Québec requested the Northeast Power Coordinating Council, Inc. (NPCC) to provide a formal written response addressing the following questions:

1. Confirm that in the US, you only look at BES Facilities for FAC-001 and FAC-002?
2. Does NPCC have reliability concerns with reducing the applicability of FAC-001 and FAC-002 in Québec to address only RTP Facilities (Register of Entities subject to Reliability Standards)?

HQ supported its request to NPCC pursuant to R-4291-2025, Decision D-2025-071, paragraph 39, which provides for HQ: *"...To request and file in this new docket the opinion of the Northeast Power Coordinating Council Inc. on the impact of the new applicability of the FAC-002-4 standard on maintaining an adequate level of reliability for the Québec Interconnection, with the objective of harmonization with neighboring networks."*

NPCC RESPONSE

1. In the US, NPCC evaluates compliance with any Facilities (new generation, transmission, or electricity end-user) that **connect** with any BES facilities. Regarding FAC-002, the Planning Coordinator is responsible for defining what a "qualified change" is for the purposes of facility interconnection (R6). Please note that there are ongoing Projects (Project 2023-05 Modifications to FAC-001 and FAC-002) that will also impact the applicability of these Standards in the US.

2. NPCC is unable to provide a response. NPCC has not and does not have the expertise to perform the required studies or other analysis to evaluate the potential reliability impact of reducing the applicability in Québec.

De :	Kimberly L. Griffith
À :	Yamaguchi, Junji
Cc :	Arthur L. Brown; Jacqueline Jimenez; Desbiens, Stéphane; Turcotte, Nicolas; Hébert, Maryse [2]; Mazza, Chantal; secrétariat-PSCAQ; Yamaguchi, Junji; Peter Yost
Objet :	Re: Request for Meeting to Clarify Applicability of FAC-001 and FAC-002 Standards
Date :	13 février 2026 14:15:49
Pièces jointes :	image001.png image002.png image003.png Outlook-A blue and.png Outlook-uhrtachr.png

ATTENTION ! CE COURRIEL PROVIENT DE L'EXTERNE

Avant d'ouvrir ou de télécharger une pièce jointe ou de cliquer sur un lien, assurez-vous que le courriel provient d'une personne ou une organisation de confiance.
Faites preuve de vigilance, développez les bons réflexes, et ne téléchargez aucune pièce jointe non sollicitée ! Au besoin, **cliquez sur le bouton *Signaler le message* sur votre barre d'outils**.

Good afternoon Junji and Team!

Fortunately our internal reviews and answer preparation took much less time than anticipated. Please see NPCC's response below to "please elaborate on the applicability for End-User Facilities as they relate to FAC-001 and FAC-002 in the United States". If you have any further questions, or if there are any one-lines or anything you would like to discuss further, please let us know.

Thank you!
Kimberly

End-User Facilities In-Scope for NERC FAC-001-4 / FAC-002-4

Core Principles

- End-user Facilities must be BES Facilities to be in-scope for FAC-001 and FAC-002. End-user Facilities are in scope if any equipment associated with their interconnection meets the BES definition.
- BES Definition: Facilities are BES if they are:
    1. Transmission Elements operated at ≥100 kV, and/or
    2. Electrically or functionally necessary to maintain BES reliability, voltage, or frequency. This would only be noted through a formal BES Inclusion Exception.
    3. BES Inclusion Exceptions are determined in accordance with the NERC Rules of Procedure.

- FAC-001 and FAC-002 obligations apply to BES equipment at an end-user's point of interconnection (POI) to the BES, such as substation equipment (breakers, buses, disconnect switches, etc.).
- Radial systems connecting end-users to the BES may be excluded if they meet the E1 Exclusion in the BES Definition, unless they are subject to a BES Inclusion Exception.
- Internal end-user distribution (<100 kV) and low-voltage equipment are typically not BES.
- Overall, it should be noted that FAC-001 and FAC-002 establish minimum interconnection requirements and TOs, PCs, and TP's are free to broaden these requirements and associated studies.

BES Exclusions

- Radial systems meeting the E1 or E3 exclusion in the BES definition.
- Internal distribution <100 kV, plant wiring, and internal transformers.
- Internal equipment: servers, machinery, HVAC, lighting, production lines.
- Buildings, offices, or internal infrastructure not participating in the BES network.

Included BES Equipment

- Transmission-connected substation equipment at ≥100 kV
- High-voltage BES breakers, disconnect switches and bus sections
- Protective relays and control devices that operate on BES-connected equipment
- Typically, the BES-connected portions of the end-user Facility are in-scope for FAC-001 and FAC-002. All internal distribution and loads are excluded, even if they are large or critical to the end user.

Kimberly Griffith
Manager, O&P Compliance
Northeast Power Coordinating Council

kgriffith@npcc.org
O: (212) 205-7051
C: (646) 276-5332
www.npcc.org

From: Yamaguchi, Junji <yamaguchi.junji@hydroquebec.com>
Sent: Friday, February 6, 2026 9:06 AM
To: Arthur L. Brown <abrown@npcc.org>; Jacqueline Jimenez <jjimenez@npcc.org>
Cc: Desbiens, Stéphane <desbiens.stephane@hydroquebec.com>; Nicolas Turcotte <turcotte.nicolas@hydroquebec.com>; Hébert, Maryse [2] <hebert.maryse2@hydroquebec.com>; Mazza, Chantal <mazza.chantal@hydroquebec.com>
Subject: Re: Request for Meeting to Clarify Applicability of FAC-001 and FAC-002 Standards

CAUTION - EXTERNAL EMAIL
Do not click on links or open any attachments unless you recognize the sender and know the contents are safe.

Diffusion restreinte

Hello,

Further to our ongoing discussions regarding the applicability of FAC-001 and FAC-002, we would also like to mention that the Régie has asked us to refile the abovementioned standards by February 25th. This delay includes a public consultation with Quebec Entities. We can certainly request a postponement if needed; however, we would prefer to limit any delay to the extent possible. In addition, we kindly request a response at your earliest convenience so that we may proceed efficiently.

As previously mentioned, we remain available for a brief meeting to further discuss the matter in order to support the processing of our request.

Thanks in advance,

Junji Y.

De : Arthur L. Brown <abrown@npcc.org>
Envoyé : 28 janvier 2026 09:56
À : Yamaguchi, Junji <yamaguchi.junji@hydroquebec.com>; Jacqueline Jimenez <jjimenez@npcc.org>
Cc : Desbiens, Stéphane <desbiens.stephane@hydroquebec.com>; Turcotte, Nicolas <turcotte.nicolas@hydroquebec.com>; Hébert, Maryse [2] <hebert.maryse2@hydroquebec.com>; Mazza, Chantal <mazza.chantal@hydroquebec.com>
Objet : RE: Request for Meeting to Clarify Applicability of FAC-001 and FAC-002 Standards

ATTENTION ! CE COURRIEL PROVIENT DE L'EXTERNE
Avant d'ouvrir ou de télécharger une pièce jointe ou de cliquer sur un lien, assurez-vous que le courriel provient d'une personne ou une organisation de confiance.
Faites preuve de vigilance, développez les bons réflexes, et ne téléchargez aucune pièce jointe non sollicitée ! Au besoin, **cliquez sur le bouton *Signaler le message* sur votre barre d'outils**.

Hi Junji,

NPCC is conferring with the Regie and will get back to you as soon as we can.

Thank you, Arthur

Arthur Brown
Associate General Counsel
Northeast Power Coordinating Council

abrown@npcc.org
O: (212) 205-7066
C: (646) 581-3278
www.npcc.org

From: Yamaguchi, Junji <yamaguchi.junji@hydroquebec.com>
Sent: Friday, January 23, 2026 2:25 PM
To: Arthur L. Brown <abrown@npcc.org>; Jacqueline Jimenez <jjimenez@npcc.org>
Cc: Desbiens, Stéphane <desbiens.stephane@hydroquebec.com>; Nicolas Turcotte <turcotte.nicolas@hydroquebec.com>; Hébert, Maryse [2] <hebert.maryse2@hydroquebec.com>; Mazza, Chantal <mazza.chantal@hydroquebec.com>
Subject: Request for Meeting to Clarify Applicability of FAC-001 and FAC-002 Standards

CAUTION - EXTERNAL EMAIL
Do not click on links or open any attachments unless you recognize the sender and know the contents are safe.

Diffusion restreinte

Greetings,

On September 22, 2025, Hydro-Québec (HQ) requested the Northeast Power Coordinating Council, Inc. (NPCC) to provide a formal written clarification regarding the applicability of FAC-001 and FAC-002 Reliability Standards.

NPCC responded on October 3, 2025, addressing both the applicability of the standards stated and the proposed applicability modifications under Project 2023-05. In its response, NPCC stated that it "*evaluates compliance with any Facilities (new generation, transmission, or electricity end-user) that connect to any BES facilities*". It should be noted that, by definition and according to the NERC Glossary, "BES facilities" and "Facilities" refer to the same concept.

1. According to FAC-002-4 Requirement R1, "*each Transmission Planner and Planning Coordinator shall study the reliability impact of interconnecting new generation, transmission, or electricity end-user Facilities and existing interconnections of generation, transmission, or electricity end-user Facilities seeking to make a qualified change as defined by the Planning Coordinator under Requirement R6*".
2. According to the BES definition, radial systems that only serve load such as end-user facilities are excluded from the BES under exclusion E1. Therefore, it is our understanding that given this exclusion, a BES end-user facility cannot be classified as part of the BES unless it contains generation resources, and even in such a case, only the generation component would fall within the scope of the BES.

HQ understands that NPCC's position means that FAC-001 and FAC-002 standards apply to BES facilities that connect to any BES facilities. HQ is of the opinion that this interpretation substantially narrows the applicability of FAC-001 and FAC-002 standards. For example, a new BES generation facility that connects to a non-BES facility wouldn't be studied by the Transmission Planner, which goes against FAC-002-4 R1.

HQ and the Régie de l'énergie (Régie) initially sought NPCC's input on the two (2) points mentioned above, due to the ambiguities involving end-user facilities. HQ observes that there is confusion between FAC-001 and FAC-002 applicability (as it is written in the standards), the BES definition and NPCC's interpretation.

To resolve this, HQ would like to propose a meeting with NPCC to clarify the applicability of the FAC-001 and FAC-002 standards, or alternatively, to obtain NPCC's recommendations regarding end-user facilities (for example the exclusion from FAC-001 and FAC-002 applicability or the introduction of a power threshold).

Kind Regards,

Junji Yamaguchi, ing., MBA
Manager
Regulatory Affairs for the Reliability Coordinator and
Common Instructions

Direction Conformité et fiabilité

Tél. : 514 289-2211,2667

Cel. : 438 862-6407

hydroquebec.com

CONFIDENTIALITY NOTICE: This electronic message contains information which may be legally confidential, privileged, or subject to copyright belonging to NPCC. The information is intended solely for the individual(s) or entity above and access by anyone else is unauthorized. If you are not the intended recipient you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this electronic message is strictly prohibited and may be unlawful. If you have received this message in error, please notify the sender immediately and permanently delete the original and any copy of this electronic message.

The information in this email has been marked with one of the following classifications: *PUBLIC, LIMITED DISCLOSURE, CONFIDENTIAL,* or *RESTRICTED-CONFIDENTIAL*. *PUBLIC*: No disclosure restrictions. *LIMITED DISCLOSURE*: Intended for a limited audience. Should not be publicly posted. *CONFIDENTIAL*: Sensitive. Do not disclose to any persons who are not already bound by a NPCC Non-Disclosure Agreement or otherwise subject to the confidentiality provisions of the NERC Rules of Procedure. *RESTRICTED-CONFIDENTIAL*: Highly sensitive. Do not disclose to others. If you need to disclose to others, first contact the sender to discuss the requirements for doing so. If the disclaimer cannot be applied directly, attach the restricted-confidential message to a new message that includes the disclaimer.

CONFIDENTIALITY NOTICE: This electronic message contains information which may be legally confidential, privileged, or subject to copyright belonging to NPCC. The information is intended solely for the individual(s) or entity above and access by anyone else is unauthorized. If you are not the intended recipient you are hereby notified that any dissemination, distribution, copying, or action taken in relation to the contents of and attachments to this electronic message is strictly prohibited and may be unlawful. If you have received this message in error, please notify the sender immediately and permanently delete the original and any copy of this electronic message.

The information in this email has been marked with one of the following classifications: *PUBLIC, LIMITED DISCLOSURE, CONFIDENTIAL,* or *RESTRICTED-CONFIDENTIAL*. *PUBLIC*: No disclosure restrictions. *LIMITED DISCLOSURE*: Intended for a limited audience. Should not be publicly posted. *CONFIDENTIAL*: Sensitive. Do not disclose to any persons who are not already bound by a NPCC Non-Disclosure Agreement or otherwise subject to the confidentiality provisions of the NERC Rules of Procedure. *RESTRICTED-CONFIDENTIAL*: Highly sensitive. Do not disclose to others. If you need to disclose to others, first contact the sender to discuss the requirements for doing so. If the disclaimer cannot be applied directly, attach the restricted-confidential message to a new message that includes the disclaimer.