

Consideration of Comments on Initial Ballot — Interpretation of MOD-001-1 and MOD-029-1 for NYISO (Project 2009-15)

Summary Consideration: Most commenters either supported the interpretation or had concerns with the use of the interpretation process.

The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of “ATC Path” and the appropriate use of the “Other Service” variable within the standards. As such, the SDT believe this is an appropriate interpretation of the standard and should be appended to the continent-wide standard.

If you feel that the drafting team overlooked your comments, 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 the Vice President and Director of Standards, Gerry Adamski, at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Voter	Entity	Segment	Vote	Comment
Donald S. Watkins	Bonneville Power Administration	1	Abstain	BPA has reviewed the NERC response for the New York ISO Interpretation request. We believe that while the response from the NERC drafting team is technically correct, it appears that there may be conflict between the NERC MOD reliability standard requirements discussed in the interpretation and the NYISO's current approved practices based upon it's FERC approved OATT.
Rebecca Berdahl		3		
Francis J. Halpin		5		
Brenda S. Anderson		6		
Response: Thank you for your comments.				
Gregory L. Pieper	Xcel Energy, Inc.	1	Negative	In general, Xcel Energy does not have any substantive issues with the proposed interpretation, as narrowly applied to a specific region. However, we do not feel this is appropriate for application/amendment to a continent-wide standard.
Response: The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of “ATC Path” and the appropriate use of the “Other Service” variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standard and should be appended to the continent-wide standard.				

¹ The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.

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Thomas C. Mielnik	MidAmerican Energy Co.	3	Negative	In this case the interpretation process is being used to verify if a responsible entity process is compliant, not to clarify or correct issues with a standard. It is inappropriate to use the interpretation process and a waste of valuable resources in this way.
Response: The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of "ATC Path" and the appropriate use of the "Other Service" variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standard and should be appended to the continent-wide standard.				
Jim D. Cyrulewski	JDRJC Associates	8	Negative	Inappropriate use of the Standards process
Response: The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of "ATC Path" and the appropriate use of the "Other Service" variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standard and should be appended to the continent-wide standard.				
Kenneth Goldsmith	Alliant Energy Corp. Services, Inc.	4	Negative	It is our opinion this is an inappropriate use of the Interpretation process. NYISO should seek a waiver not an interpretation that would be incorporated into future revisions of the standard.
Response: The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of "ATC Path" and the appropriate use of the "Other Service" variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standard and should be appended to the continent-wide standard.				
NYISO may request a variance, if desired, regardless of this interpretation.				
Anita Lee	Alberta Electric System Operator	2	Abstain	Not applicable in Alberta.
Response: Thank you for your comments.				

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Gregory Campoli	New York Independent System Operator	2	Affirmative	The NYISO is voting in favor of the proposed interpretation. The NYISO agrees with the Standards Drafting Team's ("SDT") "Response to Question #2." Specifically, the NYISO agrees that its "Transmission Flow Utilization" value can appropriately be included within the OSF and OSNF variables under R5 and R6 of MOD-029-1. The NYISO's position is that neither "Native Load," "Point-to-Point Transmission Service," "Network Integration Transmission Service" nor "any of the other components explicitly defined" under R5 or R6 would be included as part of Transmission Flow Utilization under the NYISO system. With respect to the SDT's "Response to Question #1", the NYISO wishes to clarify that under its FERC-approved market design, its internal interfaces are not "ATC Paths" and therefore it reads the interpretation as not requiring it to calculate ATC with respect to internal interfaces because there are no time periods when its customers may not schedule transactions so long as such customers are willing to pay for congestion costs. Ultimately these standards would not be applicable to the NYISO internal interfaces.
Response: Thank you for your comments.				
Gordon Pietsch	Great River Energy	1	Negative	The NYISO request for interpretation is unique to the NYISO system and their reliability region. It would be more appropriate to deal with a request of this nature through a regional variance.
Response: The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of "ATC Path" and the appropriate use of the "Other Service" variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standard and should be appended to the continent-wide standard.				
NYISO may request a variance, if desired, regardless of this interpretation.				
Dan R Schoenecker	Midwest Reliability Organization	10	Negative	This interpretation is an inappropriate use of the standards development process; this interpretation should be a variance.
Response: The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of "ATC Path" and the appropriate use of the "Other Service" variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standard and should be appended to the continent-wide standard.				
NYISO may request a variance, if desired, regardless of this interpretation.				
Michael K Wilkerson	Northern Indiana Public	5	Negative	This seems to be an inappropriate use of the interpretation procedure.

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	Service Co.			
<p>Response: The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of "ATC Path" and the appropriate use of the "Other Service" variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standards and should be appended to the continent-wide standard.</p>				
Wayne Guttormson	SaskPower	1	Negative	What material reliability impacts are there that would require the NYISO to change its practices as it describes them? The language or the interpretation of the language in the standard seems overly restrictive for no reliability benefit. A variance is probably more appropriate and modification of the existing standard.
<p>Response: The purpose of an interpretation is to clarify existing standard requirements, not to evaluate the reliability of a registered entity's current practices. The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of "ATC Path" and the appropriate use of the "Other Service" variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standards and should be appended to the continent-wide standard.</p> <p>NYISO may request a variance, if desired, regardless of this interpretation.</p>				
Bruce Merrill Dennis Florom Eric Ruskamp	Lincoln Electric System	3 5 6	Negative	While LES agrees with the Interpretation, we feel that this is an inappropriate use of the Interpretation process. The requesting entity has essentially submitted their procedures and asked the industry to determine if they are in compliance with the standard through the Interpretation process, in our opinion this is an inappropriate use of the Interpretation process. The Interpretation process is to be used to clarify an existing Requirement. Per the RSDP, an approved Interpretation will be incorporated into the standard the next time the standard is revised, this interpretation should not be incorporated into the next revision of this standard. The requesting entity should consider seeking a variance instead.
<p>Response: The SDT believes that the interpretation clarifies for both NYISO and others the NERC definition of "ATC Path" and the appropriate use of the "Other Service" variable within the standards. As such, the SDT believes this is an appropriate interpretation of the standards and should be appended to the continent-wide standard.</p> <p>NYISO may request a variance, if desired, regardless of this interpretation.</p>				