

Standard Development Roadmap

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

Development Steps Completed:

1. SAC authorized posting TTC/ATC/AFC SAR development June 20, 2005.
2. SAC authorized the SAR to be developed as a standard on February 14, 2006.
3. SC appointed a Standard Drafting Team on March 17, 2006.
4. SDT posted first draft for comment from May 25–June 25, 2007.
5. SDT posted second draft for comment from October 31–December 14, 2007.
6. SC Conducted an Initial Ballot of the standard from March 3–12, 2008.

Description of Current Draft:

This is the fourth draft of the proposed standard posted for stakeholder comments. This draft includes consideration of stakeholder comments and applicable FERC directives from FERC Order 693, Order 890, and Order 890-A.

Future Development Plan:

Anticipated Actions	Anticipated Date
1. Posting for 30-day industry comment.	April 16, 2008
2. Respond to Comments.	June 20, 2008
3. Posting for 30-day Pre-Ballot Review.	June 21, 2008
4. Initial Ballot.	July 21, 2008
5. Respond to comments.	August 20, 2008
6. Recirculation ballot.	August 21, 2008
7. 30 Day posting before board adoption.	June 21, 2008
8. Board adopts MOD-001-1.	September 1, 2008

Definitions of Terms Used in Standard

This section includes all newly defined or revised terms used in the proposed standard. Terms already defined in the Reliability Standards Glossary of Terms are not repeated here. New or revised definitions listed below become approved when the proposed standard is approved. When the standard becomes effective, these defined terms will be removed from the individual standard and added to the Glossary.

Rated System Path Methodology: The Rated System Path Methodology is characterized by an initial Total Transfer Capability (TTC), determined via simulation. Capacity Benefit Margin, Transmission Reliability Margin, and Existing Transmission Commitments are subtracted from TTC, and Postbacks and counterflows are added **as applicable**, to derive Available Transfer Capability. Under the Rated System Path Methodology, TTC results are generally reported as specific transmission path capabilities.

A. Introduction

1. **Title:** Rated System Path Methodology
2. **Number:** MOD-029-1
3. **Purpose:** To increase consistency and reliability in the development and documentation of transfer capability calculations for short-term use performed by entities using the Rated System Path Methodology to support analysis and system operations.
4. **Applicability:**
 - 4.1. Each Transmission Operator that uses the Rated System Path Methodology to calculate Total Transfer Capabilities (TTCs) for ATC Paths.
 - 4.2. Each Transmission Service Provider that uses the Rated System Path Methodology to calculate Available Transfer Capabilities (ATCs) for ATC Paths.
5. **Proposed Effective Date:** First day of the first calendar quarter that is twelve months beyond the date that all four standards (MOD-001-1, MOD-028-1, MOD-029-1, and MOD-030-1) are approved by all applicable regulatory authorities.

B. Requirements

- R1.** When calculating TTCs for ATC Paths, the Transmission Operator shall use a Transmission model which satisfies the following requirements: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
- R1.1.** The model utilizes data and assumptions consistent with the time period being studied and that meets the following criteria:
- R1.1.1.** Includes at least:
- 1.1.1.1. The Transmission Operator area. Equivalent representation of radial lines and facilities 161kV or below is allowed.
 - 1.1.1.2. All Transmission Operator areas contiguous with its own Transmission Operator area. (eEquivalent representation is allowed.)
 - 1.1.1.3. Any other Transmission Operator area linked to the Transmission Operator's area by joint operating agreement. (eEquivalent representation is allowed.)
- R1.1.2.** Models all system Elements as in-service for the assumed initial conditions.
- R1.1.3.** Models all generation (may be either a single generator or multiple generators) ~~Facilities larger that is greater~~ than 20 MVA at the point of interconnection in the studied area.
- R1.1.4.** Models phase shifters in non-regulating mode, unless otherwise specified in the Available Transfer Capability Implementation Document (ATCID).
- R1.1.5.** Uses Load forecast by Balancing Authority.
- R1.1.6.** Uses Transmission Facility additions and retirements.
- R1.1.7.** Uses Generation Facility additions and retirements.
- R1.1.8.** Uses Special Protection System (SPS) models where currently existing or projected for implementation within the studied time horizon.

have the path rated using a different method, set the TTC at that previously established amount.

- R2.8.** Create a study report that describes the steps above that were undertaken (R2.1 – R2.7), including the contingencies and assumptions used, when determining the TTC and the results of the study. Where three phase fault damping is used to determine stability limits, that report shall also identify the percent used and include justification for use unless specified otherwise in the ATCID.
- R3.** Each Transmission Operator shall establish the TTC at the lesser of the value calculated in R2 or any System Operating Limit (SOL) for that ATC Path. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
- R4.** Within seven calendar days of the finalization of the study report, the Transmission Operator shall make available to the Transmission Service Provider of the ATC Path, the most current value for TTC and the TTC study report documenting the assumptions used and steps taken in determining the current value for TTC for that ATC Path. [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
- R5.** When calculating ETC for firm Existing Transmission Commitments (ETC_F) for a specified period for an ATC Path, the Transmission Service Provider shall use the algorithm below: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]

$$ETC_F = NL_F + NITS_F + GF_F + PTP_F + ROR_F + OS_F$$

Where:

NL_F is the firm capacity set aside to serve peak Native Load forecast commitments for the time period being calculated, to include losses, and Native Load growth, not otherwise included in Transmission Reliability Margin or Capacity Benefit Margin.

NITS_F is the firm capacity reserved for Network Integration Transmission Service serving Load, to include losses, and Load growth, not otherwise included in Transmission Reliability Margin or Capacity Benefit Margin.

GF_F is the firm capacity set aside for grandfathered Transmission Service and contracts for energy and/or Transmission Service, where executed prior to the effective date of a Transmission Service Provider’s Open Access Transmission Tariff or “~~s~~Safe ~~h~~Harbor ~~t~~Tariff.” ~~accepted by FERC.~~

PTP_F is the firm capacity reserved for confirmed Point-to-Point Transmission Service.

ROR_F is the firm capacity reserved for Roll-over rights for contracts granting Transmission Customers the right of first refusal to take or continue to take Transmission Service when the Transmission Customer’s Transmission Service contract expires or is eligible for renewal.

OS_F is the firm capacity reserved for any other service(s), contract(s), or agreement(s) not specified above using Firm Transmission Service as specified in the ATCID.

- R6.** When calculating ETC for non-firm Existing Transmission Commitments (ETC_{NF}) for all time horizons for an ATC Path the Transmission Service Provider shall use the following algorithm: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]

$$ETC_{NF} = NITS_{NF} + GF_{NF} + PTP_{NF} + OS_{NF}$$

Where:

$NITS_{NF}$ is the non-firm capacity set aside for Network Integration Transmission Service serving Load (i.e., secondary service), to include losses, and load growth not otherwise included in Transmission Reliability Margin or Capacity Benefit Margin.

GF_{NF} is the non-firm capacity set aside for grandfathered Transmission Service and contracts for energy and/or Transmission Service, where executed prior to the effective date of a Transmission Service Provider's Open Access Transmission Tariff or "~~Safe Harbor Tariff~~," ~~accepted by FERC.~~

PTP_{NF} is non-firm capacity reserved for confirmed Point-to-Point Transmission Service.

OS_{NF} is the non-firm capacity reserved for any other service(s), contract(s), or agreement(s) not specified above using non-firm transmission service as specified in the ATCID.

- R7.** When calculating firm ATC for an ATC Path for a specified period, the Transmission Service Provider shall use the following algorithm: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]

$$ATC_F = TTC - ETC_F - CBM - TRM + Postbacks_F + counterflows_F$$

Where

ATC_F is the firm Available Transfer Capability for the ATC Path for that period.

TTC is the Total Transfer Capability of the ATC Path for that period.

ETC_F is the sum of existing firm commitments for the ATC Path during that period.

CBM is the Capacity Benefit Margin for the ATC Path during that period.

TRM is the Transmission Reliability Margin for the ATC Path during that period.

$Postbacks_F$ are changes to firm Available Transfer Capability due to a change in the use of Transmission Service for that period, as defined in Business Practices.

$counterflows_F$ are adjustments to firm Available Transfer Capability as determined by the Transmission Service Provider and specified in their ATCID.

- R8.** When calculating non-firm ATC for an ATC Path for a specified period, the Transmission Service Provider shall use the following algorithm: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]

$$ATC_{NF} = TTC - ETC_F - ETC_{NF} - CBM_S - TRM_U + Postbacks_{NF} + counterflows_{NF}$$

Where:

ATC_{NF} is the non-firm Available Transfer Capability for the ATC Path for that period.

TTC is the Total Transfer Capability of the ATC Path for that period.

ETC_F is the sum of existing firm commitments for the ATC Path during that period.

ETC_{NF} is the sum of existing non-firm commitments for the ATC Path during that period.

CBM_S is the Capacity Benefit Margin for the ATC Path that has been scheduled during that period.

TRM_U is the Transmission Reliability Margin for the ATC Path that has not been released for sale (unreleased) as non-firm capacity by the Transmission Service Provider during that period.

Postbacks_{NF} are changes to non-firm Available Transfer Capability due to a change in the use of Transmission Service for that period, as defined in Business Practices.

counterflows_{NF} are adjustments to non-firm Available Transfer Capability as determined by the Transmission Service Provider and specified in its ATCID.

C. Measures

- M1.** Each Transmission Operator that uses the Rated System Path Methodology shall produce any Transmission model it used to calculate TTC for purposes of calculating ATC for each ATC Path, as required in R1, for the time horizon(s) to be examined. (R1)
- M1.1.** Production shall be in the same form and format used by the Transmission Operator to calculate the TTC, ~~used in its ATC calculations,~~ as required in R1. (R1)
- M1.2.** The Transmission model produced must include the areas listed in R1.1.1 ~~+~~(or an equivalent representation, as described in the requirement) (R1.1)
- M1.3.** The Transmission model produced must show the use of the modeling parameters stated in R1.1.2 through R1.1.10; except that, no evidence shall be required to prove: 1) utilization of a Special Protection System where none was included in the model or 2) that no additions or retirements to the generation or Transmission system occurred. (R1.1.2 through R1.1.10)
- M1.4.** The Transmission Operator must provide evidence that the models used to determine TTC included Facility Ratings as provided by the Transmission Owner and Generator Owner. (R1.2)
- M2.** Each Transmission Operator that uses the Rated System Path Methodology shall produce the ATCID it uses to show where it has described and used additional modeling criteria in its ACTID that are not otherwise included in MOD-29 (R1.1.4, R.1.1.9, and R1.1.10).
- M3.** Each Transmission Operator that uses the Rated System Path Methodology with paths with ratings established prior to January 1, 1994 shall provide evidence the path and its rating were established prior to January 1, 1994. (R2.7)
- M4.** Each Transmission Operator that uses the Rated System Path Methodology shall produce as evidence the study reports, as required in R.2.8, for each path for which it determined TTC for the period examined. (R2)
- M5.** Each Transmission Operator shall provide evidence that it used the lesser of the calculated TTC or the SOL as the TTC, by producing: 1) all values calculated pursuant to R2 for each ATC Path, 2) Any corresponding SOLs for those ATC Paths, and 3) the TTC set by the Transmission Operator and given to the Transmission Service Provider for use in R7 and R8 for each ATC Path. (R3)
- M6.** Each Transmission Operator shall provide evidence (such as logs or data) that it provided the TTC and its study report to the Transmission Service Provider within seven calendar days of the finalization of the study report. (R4)
- M7.** The ~~Transmission Service Provider must be capable of~~ shall demonstrating demonstrate compliance with R5 by that for any calculation of firm ETC made in the previous sixty days, the Transmission Service Provider can recalculate recalculating the individual value of the firm ETC for any specific time period as described in (MOD-001 R2), using the algorithm defined in R5 and with data used to calculate this the specified value for the designated hour-time period. The data used must meet the requirements specified in ~~the standard~~ MOD-029-1 and the ATCID. To account for differences that may occur when recalculating the value (due to mixing automated and manual processes), any recalculated value that is, and the audited value must be within +/- 15% or 15 MW, whichever is greater, of the

~~demonstrated~~ originally calculated value, is evidence that the Transmission Service Provider used the algorithm in R5 to calculate its firm ETC result. (R5)

- M8. The ~~Transmission Service Provider must be capable of demonstrating~~ shall demonstrate compliance with R5 by ~~that for any calculation of non-firm ETC made in the previous sixty days, the Transmission Service Provider can recalculate~~ the individual value of the non-firm ETC for any specific time period as described in (MOD-001 R2), using the algorithm defined in R6 and with data used to calculate this specified value for the designated ~~hourtime~~ period. The data used must meet the requirements specified in the ~~standard MOD-029~~ and the ATCID. ~~To account for differences that may occur when recalculating the value (due to mixing automated and manual processes), any recalculated value that is and the audited value must be~~ within +/- 15% or 15 MW, whichever is greater, of the ~~originally calculated value, is evidence that the Transmission Service Provider used the algorithm in R6 to calculate its non-firm ETC demonstrated result.~~ (R6)
- M9. Each Transmission Service Provider shall produce the supporting documentation for the processes used to implement the algorithm that calculates firm ATCs, as required in R7. Such documentation must show that only the variables allowed in R7 were used to calculate firm ATCs, and that the processes use the current values for the variables as determined in the requirements or definitions. Note that any variable may legitimately be zero if the value is not applicable or calculated to be zero (such as counterflows, TRM, CBM, etc...). The supporting documentation may be provided in the same form and format as stored by the Transmission Service Provider. (R7)
- M10. Each Transmission Service Provider shall produce the supporting documentation for the processes used to implement the algorithm that calculates non-firm ATCs, as required in R8. Such documentation must show that only the variables allowed in R8 were used to calculate non-firm ATCs, and that the processes use the current values for the variables as determined in the requirements or definitions. Note that any variable may legitimately be zero if the value is not applicable or calculated to be zero (such as counterflows, TRM, CBM, etc...). The supporting documentation may be provided in the same form and format as stored by the Transmission Service Provider. (R8)

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity.

1.2. Compliance Monitoring Period and Reset Time Frame

Not applicable.

1.3. Data Retention

The Transmission Operator and Transmission Service Provider 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 Transmission Operator shall have its latest models used to determine TTC for R1. (M1)
- The Transmission Operator shall have the current, in force ATCID(s) provided by its Transmission Service Provider(s) and any prior versions of the ATCID that were in force since the last compliance audit to show compliance with R1. (M2)

- The Transmission Operator shall retain evidence of any path and its rating that was established prior to January 1, 1994. (M3)
 - The Transmission Operator shall retain the latest version and prior version of the TTC study reports to show compliance with R2. (M4)
 - The Transmission Operator shall retain evidence for the most recent three calendar years plus the current year to show compliance with R3 and R4. (M5 and M6)
 - The Transmission Service Provider shall retain evidence to show compliance in calculating hourly values required in R5 and R6 for the most recent 14 days; evidence to show compliance in calculating daily values required in R5 and R6 for the most recent 30 days; and evidence to show compliance in calculating daily values required in R5 and R6 for the most recent sixty days. ~~to show compliance with R5 and R6.~~ (M7 and M8)
 - The Transmission Service Provider shall retain evidence for the most recent three calendar years plus the current year to show compliance with R7 and R8. (M9 and M10)
 - If a Transmission Service Provider or Transmission Operator 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 records and all requested and submitted subsequent audit records.

1.4. Compliance Monitoring and Enforcement Processes:

The following processes may be used:

- Compliance Audits
- Self-Certifications
- Spot Checking
- Compliance Violation Investigations
- Self-Reporting
- Complaints

1.5. Additional Compliance Information

None.

2. Violation Severity Levels

R #	Lower VSL	Moderate <u>VSL</u>	High VSL	Severe VSL
R1.	<p>The Transmission Operator used a model that met all but one of the modeling requirements specified in R1.1.</p> <p style="text-align: center;">OR</p> <p>The Transmission Operator utilized one to ten Facility Ratings that were different from those specified by a Transmission Owner or Generation Owner in their Transmission model. <u>(R1.2)</u></p> <p><i>Note: A modeling error (a violation of the criteria in R1) is a single violation, regardless how many times that error has been modeled.</i></p>	<p>The Transmission Operator used a model that met all but two of the modeling requirements specified in R1.1.</p> <p style="text-align: center;">OR</p> <p>The Transmission Operator utilized eleven to twenty Facility Ratings that were different from those specified by a Transmission Owner or Generation Owner in their Transmission model. <u>(R1.2)</u></p> <p><i>Note: A modeling error (a violation of the criteria in R1) is a single violation, regardless how many times that error has been modeled.</i></p>	<p>The Transmission Operator used a model that met all but three of the modeling requirements specified in R1.1.</p> <p style="text-align: center;">OR</p> <p>The Transmission Operator utilized twenty-one to thirty Facility Ratings that were different from those specified by a Transmission Owner or Generation Owner in their Transmission model. <u>(R1.2)</u></p> <p><i>Note: A modeling error (a violation of the criteria in R1) is a single violation, regardless how many times that error has been modeled.</i></p>	<p>The Transmission Operator used a model that did not meet four or more of the modeling requirements specified in R1.1.</p> <p style="text-align: center;">OR</p> <p>The Transmission Operator utilized more than thirty Facility Ratings that were different from those specified by a Transmission Owner or Generation Owner in their Transmission model. <u>(R1.2)</u></p> <p><i>Note: A modeling error (a violation of the criteria in R1) is a single violation, regardless how many times that error has been modeled.</i></p>
R2	<p><u>One or more both violations below constitutes a single Lower violation of R2of the following:</u></p> <ul style="list-style-type: none"> • <u>The Transmission Operator did not calculate TTC using one of the items in sub-requirements R2.1-R2.6.</u> • <u>The Transmission Operator does not include one required item in the study report required in R2.8.</u> 	<p><u>One or more both violations below constitutes a single Moderate violation of R2of the following:</u></p> <ul style="list-style-type: none"> • <u>The Transmission Operator did not calculate TTC using two of the items in sub-requirements R2.1-R2.6.</u> • <u>The Transmission Operator does not include two required items in the study report required in R2.8.</u> 	<p><u>One or more both violations below constitutes a single High violation of R2of the following:</u></p> <ul style="list-style-type: none"> • <u>The Transmission Operator did not calculate TTC using three of the items in sub-requirements R2.1-R2.6.</u> • <u>The Transmission Operator does not include three required items in the study report required in R2.8.</u> 	<p><u>One or more violations below constitutes a single Severe violation of R2of the following:</u></p> <ul style="list-style-type: none"> • <u>The Transmission Operator did not calculate TTC using four or more of the items in sub-requirements R2.1-R2.6.</u> • <u>The Transmission Operator did not apply R2.7.</u> • <u>The Transmission Operator does not include four or more required items in the study report required</u>

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R #	Lower VSL	Moderate <u>VSL</u>	High VSL	Severe VSL
	N/A	N/A	N/A	<p><u>in R2.8</u></p> <ul style="list-style-type: none"> The Transmission Operator did not calculate TTC using the process described in R2.
R3.	The Transmission Operator did not specify the TTC as the lesser of the TTC calculated using the process described in R2 or any associated SOL for more than zero ATC Paths, BUT, not more than 1% of all ATC Paths or 1 ATC Path (whichever is greater).	The Transmission Operator did not specify the TTC as the lesser of the TTC calculated using the process described in R2 or any associated SOL for more than 1% of all ATC Paths or 1 ATC Path (whichever is greater), BUT not more than 2% of all ATC Paths or 2 ATC Paths (whichever is greater).	The Transmission Operator did not specify the TTC as the lesser of the TTC calculated using the process described in R2 or any associated SOL for more than 2% of all ATC Paths or 2 ATC Paths (whichever is greater), BUT not more than 5% of all ATC Paths or 3 ATC Paths (whichever is greater).-	The Transmission Operator did not specify the TTC as the lesser of the TTC calculated using the process described in R2 or any associated SOL, for more than -5% of all ATC Paths or 3 ATC Paths (whichever is greater).
R4.	The Transmission Operator provided the TTC and study report to the Transmission Service Provider more than seven, but not more than 14 calendar days after the report was finalized.	The Transmission Operator provided the TTC and study report to the Transmission Service Provider more than 14, but not more than 21 calendar days after the report was finalized.	The Transmission Operator provided the TTC and study report to the Transmission Service Provider more than 21, but not more than 28 calendar days after the report was finalized.	The Transmission Operator provided the TTC and study report to the Transmission Service Provider more than 28 calendar days after the report was finalized.
R5.	For a specified period, the Transmission Service Provider calculated a firm ETC with an absolute value different than that calculated in M7 for the same period, and the absolute value difference was more than 15% of the value calculated in the measure or 15MW, whichever is greater, but not more than 25% of the value calculated in the measure or	For a specified period, the Transmission Service Provider calculated a firm ETC with an absolute value different than that calculated in M7 for the same period, and the absolute value difference was more than 25% of the value calculated in the measure or 25MW, whichever is greater, but not more than 35% of the value calculated in the measure or	For a specified period, the Transmission Service Provider calculated a firm ETC with an absolute value different than that calculated in M7 for the same period, and the absolute value difference was more than 35% of the value calculated in the measure or 35MW, whichever is greater, but not more than 45% of the value calculated in the measure or	For a specified period, the Transmission Service Provider calculated a firm ETC with an absolute value different than that calculated in M7 for the same period, and the absolute value difference was more than 45% of the value calculated in the measure or 45MW, whichever is greater.

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R #	Lower VSL	Moderate <u>VSL</u>	High VSL	Severe VSL
	25MW, whichever is greater. -	35MW, whichever is greater. -	45MW, whichever is greater.	
R6.	For a specified period, the Transmission Service Provider calculated a non-firm ETC with an absolute value different than that calculated in M8 for the same period, and the absolute value difference was more than 15% of the value calculated in the measure or 15MW, whichever is greater, but not more than 25% of the value calculated in the measure or 25MW, whichever is greater.-	For a specified period, the Transmission Service Provider calculated a non-firm ETC with an absolute value different than that calculated in M8 for the same period, and the absolute value difference was more than 25% of the value calculated in the measure or 25MW, whichever is greater, but not more than 35% of the value calculated in the measure or 35MW, whichever is greater.-	For a specified period, the Transmission Service Provider calculated a non-firm ETC with an absolute value different than that calculated in M8 for the same period, and the absolute value difference was more than 35% of the value calculated in the measure or 35MW, whichever is greater, but not more than 45% of the value calculated in the measure or 45MW, whichever is greater. -	For a specified period, the Transmission Service Provider calculated a non-firm ETC with an absolute value different than that calculated in M8 for the same period, and the absolute value difference was more than 45% of the value calculated in the measure or 45MW, whichever is greater.-
R7.	The Transmission Service Provider did not use all the elements defined in R7 when determining firm ATC, or used additional elements, for more than zero ATC Paths, but not more than 5% of all ATC Paths or 1 ATC Path (whichever is greater).	The Transmission Service Provider did not use all the elements defined in R7 when determining firm ATC, or used additional elements, for more than 5% of all ATC Paths or 1 ATC Path (whichever is greater), but not more than 10% of all ATC Paths or 2 ATC Paths (whichever is greater).	The Transmission Service Provider did not use all the elements defined in R7 when determining firm ATC, or used additional elements, for more than 10% of all ATC Paths or 2 ATC Paths (whichever is greater), but not more than 15% of all ATC Paths or 3 ATC Paths (whichever is greater).	The Transmission Service Provider did not use all the elements defined in R7 when determining firm ATC, or used additional elements, for more than 15% of all ATC Paths or more than 3 ATC Paths (whichever is greater).
R8.	The Transmission Service Provider did not use all the elements defined in R8 when determining non-firm ATC, or used additional elements, for more than zero ATC Paths, but not more than 5% of all ATC	The Transmission Service Provider did not use all the elements defined in R8 when determining non-firm ATC, or used additional elements, for more than 5% of all ATC Paths or 1 ATC Path (whichever is	The Transmission Service Provider did not use all the elements defined in R8 when determining non-firm ATC, or used additional elements, for more than 10% of all ATC Paths or 2 ATC Paths	The Transmission Service Provider did not use all the elements defined in R8 when determining non-firm ATC, or used additional elements, for more than 15% of all ATC Paths or more than 3 ATC

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R #	Lower VSL	Moderate <u>VSL</u>	High VSL	Severe VSL
	Paths or 1 ATC Path (whichever is greater).	greater), but not more than 10% of all ATC Paths or 2 ATC Paths (whichever is greater).	(whichever is greater), but not more than 15% of all ATC Paths or 3 ATC Paths (whichever is greater).	Paths (whichever is greater).