

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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This form is to be used to submit comments on Draft 1 of two individual SARs: 1) Proposed Revisions to Existing Standard Number MOD-001-0 dealing with AFC/ATC/TTC; and 2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 dealing with CBM/TRM. Comments must be submitted by **August 08, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "ATC/TTC/CBM/TRM Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Ronald Szymaczak
Organization:	Exelon
Telephone:	630-437-2795
Email:	ronald.szymczak@exeloncorp.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



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The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

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**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
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		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
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		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: The standard must state that aspects of the calculation critical to the reliability be required in the methodologies. Some examples of the aspects critical to reliability are exchange and use of data, monitoring all critical flowgates and meeting a minimum frequency of calculation. These items and any others must be required in the methodologies. What method the ATC calculator uses to accomplish these critical aspects is up to them and therefore a standard method should not be required.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

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**5. Do you agree with the list of entities to which the standard would apply?**

- Yes  
 No

Comments:

**6. Do you have any other terms that should be included in the definitions?**

- Yes  
 No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

- Yes  
 No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments: ATC/TTC SAR does not require a RTO or ISO to have a methodology that meets the requirements in this proposed standard. The following wording changes (noted in CAPITALS) to section B-R1 are recommended.

MOD-001-0 Requirement 1 (R1). Each group of transmission service providers and/or AFC/ATC/TTC calculators within a region, in conjunction with the members of that region shall jointly develop and document a REGIONAL TTC and ATC (which may include the calculation of ATC) methodology.

If the transmission service providers and/or AFC/ATC/TTC calculators' AFC, TTC, and ATC values are determined by RTO or ISO, then a jointly developed regional methodology is not required for those members. RTO members not covered by an RTO/ISO would be required to have a jointly developed regional methodology. A RTO OR ISO THAT CALCULATES AFC/ATC/TTC IS REQUIRED TO HAVE A WRITTEN METHODOLOGY DOCUMENT THAT MEETS THE REQUIREMENTS SPECIFIED IN THIS STANDARD.

M2 needs to specify that RTOS AND ISOS WILL ALSO BE REQUIRED TO PERFORM THIS REVIEW OF CONSISTENCY WITH PLANNING CRITERIA AND DOCUMENT THE RESULTS. If this requirement is not

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added, there is no check on the consistency with planning criteria for members who are not under the regional methodology but under a RTO or ISO methodology.

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: Earlier in the development of this industry, there were predominately 'local' vertically integrated electric utilities. Each utility built sufficient generation to serve its own load responsibility. Transmission interconnections with neighboring utilities were typically established for one of the following reasons:

First, to minimize duplication of transmission (ie. tie to neighbor for transmission reliability.)

Second, was an economic decision to build transmission instead of generation based on the generation reliability criteria the utility planned for (ie. tie to neighbor to meet generation reliability criteria.)

This second reason is the origin of the CBM concept. Transmission interconnections provide each interconnected system with access to their neighbors so that in the event of an extreme generation outage within a utility, that temporarily generation deficient utility could have access to 'emergency' generation resources from their interconnected neighbors. CBM is the quantification of this use of the transmission system. Therefore CBM is an 'emergency' use transmission quantity and only 'exists' on the importing system for use only during periods of an emergency generation deficiency when firm transmission service is not available. Just as transmission capacity is preserved for the generation contingencies a utility planned for, transmission capacity is also preserved for the generation contingencies that are planned for. In either case, the utility customers paid for the transmission capacity that was installed to maintain the reliability level that is planned for, via their rates for service.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

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Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments:

**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: CBM/TRM SAR does not require a RTO or ISO to have a methodology that meets the requirements in this proposed standard. The following word changes (noted in CAPITALS) to section R1 of the CBM portion are recommended -

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R1. Each group of transmission service providers/and or AFC/ATC/TTC calculators within a region, in conjunction with the members of that region shall jointly develop and document a REGIONAL CBM methodology. This methodology shall be available to NERC, the Regions, and the stakeholders in the electricity market.

If a RRO's members CBM values are determined by a RTO or ISO, then a jointly developed regional methodology is not required for those members. RRO members not covered by an RTO/ISO would be required to have a jointly developed regional methodology. A RTO OR ISO THAT CALCULATES CBM AND OR TRM IS REQUIRED TO HAVE A WRITTEN METHODOLOGY DOCUMENT THAT MEETS THE REQUIREMENTS SPECIFIED IN THIS STANDARD.

M4 needs to specify that THE RRO MUST REVIEW AND APPROVE THE RTO OR ISO CBM METHODOLOGY TO ENSURE IT IS CONSISTENT WITH THE RRO'S PLANNING AND OPERATING CRITERIA. If this requirement is not added there appears to be no check of a RTO or ISO' ATC/TTC methodology.

CBM/TRM SAR does not require a RTO or ISO to have a methodology that meets the requirements in this proposed standard. The following wording changes (noted in CAPITALS) to section R1 of the TRM portion are recommended :

R1. Each group of transmission service providers/and or AFC/ATC/TTC calculators within a region, in conjunction with the members of that region in conjunction with its members, shall jointly develop and document a REGIONAL TRM methodology. This methodology shall be available to NERC, the Regions, and the transmission users in the electricity market. If a RRO's members TRM values are determined by a RTO or ISO, then a jointly developed regional methodology is not required for those members. RRO members not covered by an RTO/ISO would be required to have a regional methodology. A RTO OR ISO CALCULATES CBM AND OR TRM IS REQUIRED TO HAVE A METHODOLOGY DOCUMENT THAT MEETS THE REQUIREMENTS SPECIFIED IN THIS STANDARD.

In addition, the text in section R1 of the SAR needs to be revised to clarify that the following reviews are done by the RRO. First, the RRO needs to review the calculations of transmission providers under the regional methodology to ensure they are adhering to the regional methodology. Second, the RRO must review the transmission service provider(s)' not under the regional methodology to ensure that their methodology is consistent with the RRO's Planning Criteria. Finally, the RRO is responsible for ensuring that TRM calculations done by transmission service providers', regardless of what methodology they are under, are consistent with the individual TOs planning criteria. The following wording changes noted in CAPITALS are recommended:

The RRO must review and approve the METHODOLOGY OF transmission service provider(s)' NOT UNDER THE REGIONAL methodology to ensure it is consistent with the RRO's Planning Criteria. The RRO is responsible for ensuring that TRM calculations are consistent with the individual TOs planning criteria.

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Organization:		
Telephone:		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
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		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
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		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments: Reliability must be maintained at all times including accounting for planned outages and unexpected dynamic system conditions, while at the same time providing for ATC/AFC to users of the the system. Therefore there is a reliability need for this standard. A transmission system has finite capability and the provision for a transmission reliability margin (TRM) is an important component in determining ATC/AFC and is necessary to take into account such varied system conditions in order to maintain reliability while not overstating the ATC/AFC. However, the ATC values are not reliability indicators, but rather the ATC values are derived from reliability based values, assumptions and criteria.

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: The proposed standard should require that ATC/AFC values be coordinated across interfaces. The standard should not require one specific uniform methodology for each ATC/AFC calculator for calculating ATC, AFC and TTC, but should require that the Regional Reliability Organizations (including RTO/ISOs) develop a region wide methodology that meets the needs of each respective Planning Authority within the region, such that when applied by individual ATC/AFC calculators would produce consistent results at all interfaces.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

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**and MOD-009-0**

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Comments: No, it is not necessary, but to the extent some sort of business issues need to be addressed, such as response times for OASIS requests, it should be limited strictly to business practices, and not address reliability issues.

**5. Do you agree with the list of entities to which the standard would apply?**

- Yes  
 No

Comments: This standard should also apply to the Planning Authority and the Reliability Regions.

**6. Do you have any other terms that should be included in the definitions?**

- Yes  
 No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

- Yes  
 No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments: Requirement R1.11 states "Ensure that the TTC/ATC calculations are consistent with the TO/TP planning and operating criteria." The standard must be more descriptive about the relationship between these calculations and their consistency with the appropriate planning criteria. The basic criteria utilized for determining acceptable reliability levels should be consistent, but the assumptions and conditions evaluated may be somewhat different to take into account short-term or real-time system conditions as compared to long term planning assumptions. The time horizons for each process will create differences that must be recognized. In many cases, there will be situations that exist in the short term that were not anticipated or modeled in the longer term (> than 1 year) planning cases, such as, planned or

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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unplanned generator outages or line outages. However, the system security must be evaluated with these outages if they extend over the study period when calculating ATC.

Requirement R1.5 states "Require that ATC values and posting be updated at a minimum frequency to assure proper representation of the transmission system. These values will be made available to stakeholders at a similar frequency". This requirement should not establish a minimum frequency for updating or posting, rather, it should require a minimum frequency of review, with update and posting, only if necessary. It is imperative that the standard establish frequency minimums and timings that are practical and meaningful. Requirement R1.7 specifies minimum update frequencies for 10 items. The standard should be very clear that if values have not changed from the previous posting, such as in the case where there are not any unscheduled transmission outages (R1.7.3), there is not a requirement to post an update.

Requirement R1.7 states "Require that the data listed below, and other data needed by transmission providers for the calculation of TTC and ATC values are shared and used." Add the words "by transmission providers" to the end of the sentence above. This addition will ensure that there is not a requirement to share this sensitive data with the public.

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**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

- Yes  
 No

Comments: Reliability must be maintained at all times including accounting for planned outages and unexpected dynamic system conditions, while at the same time providing for ATC/AFC to users of the the system. Therefore there is a reliability need for this standard. A transmission system has finite capability and the provision for a transmission reliability margin (TRM) is an important component in determining ATC/AFC and is necessary to take into account such varied system conditions in order to maintain reliability while not overstating the ATC/AFC.

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

- Yes  
 No

Comments: Since CBM is an "implied" reservation of a portion of the transmission capability it is important to include it an ATC calculations to ensure reliability.

**11. Do you agree with the scope of the proposed standard?**

- Yes  
 No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

- Yes  
 No

Comments: No, it is not necessary, but to the extent some sort of business issues need to be addressed, such as response times for OASIS requests, it should be limited strictly to business practices, and not address reliability issues. Additionally, TRM is a reliability quantity and therefore would be inappropriate for NAESB to have a parallel standard.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**13. Do you agree with the list of entities to which the standard would apply?**

- Yes  
 No

Comments: This standard should also apply to the Planning Authority and the Reliability Regions.

**14. Do you have any other terms that should be included in the definitions?**

- Yes  
 No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

- Yes  
 No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: "MOD-008-1 R1.5.1 Any variances must also be approved by NERC or its designate. Delete this requirement. Variances should be approved by the Regional Reliability Organizations, not NERC, since the RROs have an approved methodology."

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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---

This form is to be used to submit comments on Draft 1 of two individual SARs: 1) Proposed Revisions to Existing Standard Number MOD-001-0 dealing with AFC/ATC/TTC; and 2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 dealing with CBM/TRM. Comments must be submitted by **August 08, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "ATC/TTC/CBM/TRM Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

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  - Do use punctuation and capitalization as needed (except quotations).
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- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:	Soulier Daniel Victor Bissonnette	
Organization:	Hydro-Québec TransÉnergie	
Telephone:	(514) 289-3123	
Email:	soulier.daniel@hydro.qc.ca bissonnette.victor@hydro.qc.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable		



**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
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**Background Information:**

The Long-Term AFC/ATC Task Force (LTATF) was formed to develop specific recommendations for the calculation and coordination of AFC/ATC with the goal of increasing market liquidity and enhancing grid reliability. The task force’s work was coordinated with NAESB to separate business practices from reliability concerns. The LTATF evaluated the results of the short-term recommendations in the Alliant West area for summer 2004, and used this evaluation when considering whether to recommend the Alliant West short-term recommendations continue.

In developing their recommendations the LTATF considered the calculation for AFC/ATC, communication and coordination of AFC/ATC, and consistency between transmission planning and AFC/ATC calculations. A final LTATF report was presented to the Standing Committees in March 2005. The task force used the report and recommendations to develop proposed standards for ATC/TTC and CBM/TRM. The proposed “Modification to MOD-001-0 Documentation of ATC and TTC Calculation” SAR and “Modification to standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 SAR are the culmination<sup>1</sup> of the LTATF’s work and is the subject matter for this Comment Form.

The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments: Yes for TTC: TTCs reflect the operating/planning system conditions thus have to be accurate to achieve system reliability

No for ATC/AFC : ATCs/AFCs are quantities that are based on different market rules to access the transmission systems and to manage system congestion. Thus ATC and AFC should be market driven

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: The proposed standard is already going too much into methodology details

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: the standard should be limited to TTC/TFC for reliability purposes and ATC/AFC should be addressed by NAESB

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: System quantities that are required by the market (such as ATC/AFC ) should be defined by NAESB

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**5. Do you agree with the list of entities to which the standard would apply?**

- Yes  
 No

Comments: LSE, PSE, MO, PA, TP

**6. Do you have any other terms that should be included in the definitions?**

- Yes  
 No

Comments:

- NATC and RATC .firm or non firm should be defined by NAESB
- ultimate source and sink have a role in TTC determination and should be included in the NERC standard

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

- Yes  
 No

Comments: The proposed standard is already too much directive and may unduly impose some coordination requirements to some transmission service providers

**8. Do you have any other comments on these proposed standards?**

Comments: The proposed standard is asking for exhaustive coordination in TTC/ATC/AFC calculation. Outside system boundary coordination requirements are needed in some parts of an Interconnection but could be minimal in other parts. For example, such exhaustive coordination is not required for DC transmission facilities between two asynchronous system.

Hydro-Québec TransÉnergie believes that although standardization and coordination of the calculation of ATC, AFC, TTC and the related definitions of TRM and CBM is a valuable goal, it must take into account the specifics of each System. In its own particular case, Hydro-Québec TransÉnergie's system is in fact a distinct Interconenction as it is not synchronized with the Eastern Interconnection. Its ties with the Eastern Interconnection are either controllable (DC ties) or radial (generation/load pockets isolated from one system and synchronized with the other). This situation must be taken into account when calculating TTC and ATC.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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Not being subject to loop flows originating from neighboring Systems and its internal dispatch causing no such loop flows on those Systems, Hydro-Québec TransÉnergie does not have to participate in coordination to calculate flowgate capacities (AFC). Hydro-Québec TransÉnergie already posts its calculation methodology for ATC on its OASIS. The drafting team should include such considerations in the preparation of the relevant standards.

**SAR Comment Form**  
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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments: Yes for the TRM use to take into account inaccuracy/uncertainty in TTCs forecasted values. No for the CBM and the TRM use to retain transmission capacity for unplanned utilisation. System reliability impacted by transmission congestion could be managed by the market through adequate and well coordinated market rules. LSEs should gain firm access to the system to be protected for contingencies by acquiring adequate transmission service from the source to the load, not by CBM and/or TRM.

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: LSEs should gain firm access to the system to be protected for contingencies by acquiring adequate transmission service from the source to the load, not by CBM and/or TRM.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: see 9. in addition over utilisation of TRM and CBM may lead to limit open access to the system

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: System reliability impacted by transmission congestion could be managed by the market through adequate and well coordinated market rules

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**and MOD-009-0**

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**13. Do you agree with the list of entities to which the standard would apply?**

- Yes  
 No

Comments: LSE, PSE, MO, PA, TP

**14. Do you have any other terms that should be included in the definitions?**

- Yes  
 No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

- Yes  
 No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: The proposed standard is asking for exhaustive coordination in TRM calculation. Outside system boundary coordination requirements are needed in some parts of an Interconnection but could be minimal in other parts. For example, such exhaustive coordination is not required for DC transmission facilities between two asynchronous system.

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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Ron Falsetti
Organization:	Ontario - Independent Electricity System Operator
Telephone:	905-855-6187
Email:	ron.falsetti@ieso.ca
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**SAR Comment Form**  
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**Background Information:**

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		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

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**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

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**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: IESO agrees that the proposed scope of the standard is sufficient to address reliability concerns. IESO disagrees that there needs to be a standard method for calculation of ATC, AFC and TTC for all ISOs/RTOs. Some differences in methodologies (market, non-market, etc.) may exist, but the processes must be coordinated and work together.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: See comments above.

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

Comments: Aspects of this standard would also apply to Transmission Planner, Transmission Owner, Planning Authority, RC and Regional Reliability Organization.

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments:

IESO would suggest the following replace all of R1, not just the first paragraph:

“The development of TTC/ATC/AFC methodology is primarily the responsibility of the Transmission Provider, but may be delegated to a Balancing Authority, a Reliability Coordinator. All responsible entities shall develop and document a TTC and ATC/AFC methodology. In the case where the methodology is developed by a designated entity, that methodology document must clearly indicate to which Transmission Providers it applies. That methodology shall be reviewed by the RRO to ensure coordination between the entities within that region and to ensure compliance with this standard. This methodology document shall be available to NERC, the Regions, and the stakeholders in the electricity market.”

With this change, the language in R1.12 is no longer required.

R1.7 - Several items in the set may be considered confidential information that should not be shared with market participants (such as generator outages and generator dispatch orders). These items can be shared with Transmission Service Providers to be used in TTC and ATC calculations but not be released to market participants.

R1.7.2 - Because of variations on how generation is dispatched in different markets, the drafting team will need to be clear on the generator dispatch information being requested and how it will be used.

R1.7.2 - For generators that will be used to determine firm AFC, these should be limited to generators that have already secured firm usage of the transmission system. A transmission service provider should not include generators in the firm AFC calculation that do not have firm transmission service backing them up.

R1.7.6 - The IESO does not believe a NERC standard should reference a specific tool (such as the SDX). It should be more general and apply to the current tool(s)?

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**and MOD-009-0**

---

R1.7.7 - IESO doesn't understand why AFC will be exchanged only between entities that have coordination agreements. In the Monitoring/Coordination Section of the LTATF Final Report, it states "The Task Force recommends the revision of the existing NERC standards to require the recognition and respect of impacts on external flowgates/paths in AFC/ATC calculations, and the establishment of NERC standards on AFC/ATC coordination." Monitoring other party flowgates was recommendation V. in the AWTTF Short-Term Recommendations.

R1.9 - The assumption should also include treatment of transmission requests with a status of Study (for both the transmission provider requests and neighboring transmission provider requests) and long-term firm reservations with roll-over rights (for both the transmission provider requests and neighboring transmission provider requests).

General - The concepts in Appendix will need to be considered in development of the standard. It contains ATC and AFC formula that are not stated in the body of the SAR.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: Some areas use zero for CBM. If CBM is used, the standardized definitions should be used and amount disclosed.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: Aspects of this standard should also apply to Transmission Planner, Transmission Owner, Planning Authority, RC and Regional Reliability Organization

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments:

COMMENTS TO MOD-004-0 and MOD-008-0

R1 - References to having a single regional CBM methodology and TRM methodology should be removed along with references to exceptions for entities that are members of an RTO or an ISO.

R.1.6 - To the extent generators that are not committed to serve load inside the transmission provider's system are considered in the CBM requirement determination, there should be CBM preserved on impacted flowgates for the use of this generation.

Please note the numbering error. There are two R1.4, R1.5 and R1.6.

R1.8 - CBM should not be used in place of maintaining either minimum planning reserves or to compensate for poor generator maintenance practices.

General - When establishing CBM import area boundaries, there is an explicit assumption that all generators can serve all load within the boundary (with no constraints). As part of the description of the CBM calculation process, it should describe the basis for establishing the CBM import area boundaries.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

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  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
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  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Kathleen M. Goodman
Organization:	ISO New England
Telephone:	(413) 535-4111
Email:	kgoodman@iso-ne.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**SAR Comment Form**  
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The Long-Term AFC/ATC Task Force (LTATF) was formed to develop specific recommendations for the calculation and coordination of AFC/ATC with the goal of increasing market liquidity and enhancing grid reliability. The task force’s work was coordinated with NAESB to separate business practices from reliability concerns. The LTATF evaluated the results of the short-term recommendations in the Alliant West area for summer 2004, and used this evaluation when considering whether to recommend the Alliant West short-term recommendations continue.

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The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
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**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments:

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: Aspects of this standard will also apply to Transmission Planner and Regional Reliability Organization

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments:

Comments on the proposed wording:

- The current wording of R1 is very confusing, and does not require that RTO/ISOs have a documented methodology. It seems to be trying to acknowledge that some TPs within an RRO may be using an RTO/ISO methodology. We would recommend that while there may be more than one methodology applicable in a region, it should be required that the methodology for every TP in the RRO be available on the RRO website.

- R3 is duplicative and should be deleted

- We do not understand why Generation Dispatch orders are required for TTC/ATC coordination, Generation Outage coordination should be adequate

- It is unclear in the SAR what the intent is of the Appendix. We do not support the definitions shown being included in the standard.

Recommendation for a Regional Difference:

We suggest that a Regional Difference be added to acknowledge that for TPs within a purely financial market, the ATC requirements of this standard are not applicable. However, the requirements associated with TTC continue to be applicable to these TPs. In addition, if these TPs do post ATC, they should be required to post the methodology used to calculate those posted values.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: While not all TPs use CBM, those that do use it for reliability reasons.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: Aspects of this standard will also apply to Transmission Planner and Regional Reliability Organization

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: Comments on the proposed wording:

- R1 of MOD-004 and MOD-008 are confusing and do not require an ISO/RTO to post their methodology.

While there may be more than one methodology applicable in a region, it should be required that the methodology for every TP in the RRO be available on the RRO website

- R1.8.1 MOD-008 implies that TRM is set as a fixed amount which must be maintained through time, since entities would be required to "plan and reinforce the transmission system for the amount of TRM being preserved". We feel that this is an inappropriate requirement, since TRM represents a variable quantity based on known system conditions plus uncertainty.

- R1.8.2 of MOD-008 is not related to item 1.8 and should be moved in the text to be before and applicable to all R1.x requirements.

**SAR Comment Form**  
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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
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<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	
<input type="checkbox"/> WECC	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> NA - Not Applicable		



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**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
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		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

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**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
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		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
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		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: We agree that the proposed scope of the standard is sufficient to address reliability concerns. We disagree that there needs to be a standard method for calculation of ATC, AFC and TTC for all ISOs/RTOs. Some differences in methodologies (market, non-market, etc.) may exist, but the processes must be coordinated and work together.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: See comments above.

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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Comments: Aspects of this standard would also apply to Transmission Planner, Transmission Owner, Planning Authority, RC and Regional Reliability Organization.

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments:

We would suggest the following replace all of R1, not just the first paragraph:

“The development of TTC/ATC/AFC methodology is primarily the responsibility of the Transmission Provider, but may be delegated to a Balancing Authority, a Reliability Coordinator. All responsible entities shall develop and document a TTC and ATC/AFC methodology. In the case where the methodology is developed by a designated entity, that methodology document must clearly indicate to which Transmission Providers it applies. That methodology shall be reviewed by the RRO to ensure coordination between the entities within that region and to ensure compliance with this standard. This methodology document shall be available to NERC, the Regions, and the stakeholders in the electricity market.”

With this change, the language in R1.12 is no longer needed.

R1.7 - Several items in the set may be considered confidential information that should not be shared with market participants (such as generator outages and generator dispatch orders). These items can be shared with Transmission Service Providers to be used in TTC and ATC calculations but not be released to market participants.

R1.7.2 - Because of variations on how generation is dispatched in different markets, the drafting team will need to be clear on the generator dispatch information being requested and how it will be used.

R1.7.2 - For generators that will be used to determine firm AFC, these should be limited to generators that have already secured firm usage of the transmission system. A transmission service provider should not include generators in the firm AFC calculation that do not have firm transmission service backing them up.

R1.7.6 - Should a NERC standard reference a tool (such as the SDX) or be more general and apply to the current tool?

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**and MOD-009-0**

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R1.7.7 - We don't understand why AFC will be exchanged only between entities that have coordination agreements. In the Monitoring/Coordination Section of the LTATF Final Report, it states "The Task Force recommends the revision of the existing NERC standards to require the recognition and respect of impacts on external flowgates/paths in AFC/ATC calculations, and the establishment of NERC standards on AFC/ATC coordination." Monitoring other party flowgates was recommendation V. in the AWTTF Short-Term Recommendations.

R1.9 - The assumption should also include treatment of transmission requests with a status of Study (for both the transmission provider requests and neighboring transmission provider requests) and long-term firm reservations with roll-over rights (for both the transmission provider requests and neighboring transmission provider requests).

General - The concepts in Apendix will need to be considered in development of the standard. It contains ATC and AFC formula that are not stated in the body of the SAR.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: Some areas use zero for CBM. If CBM is used, the standardized definitions should be used and amount disclosed.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: Aspects of this standard should also apply to Transmission Planner, Transmission Owner, Planning Authority, RC and Regional Reliability Organization

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments:

COMMENTS TO MOD-004-0 and MOD-008-0

R1 - References to having a single regional CBM methodology and TRM methodology should be removed along with references to exceptions for entities that are members of an RTO or an ISO.

R.1.6 - To the extent generators that are not committed to serve load inside the transmission provider's system are considered in the CBM requirement determination, there should be CBM preserved on impacted flowgates for the use of this generation.

There are two R1.4, R1.5 and R1.6.

R1.8 - CBM should not be used in place of maintaining either minimum planning reserves or to compensate for poor generator maintenance practices.

General - When establishing CBM import area boundaries, there is an explicit assumption that all generators can serve all load within the boundary (with no constraints). As part of the description of the CBM calculation process, it should describe the basis for establishing the CBM import area boundaries.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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This form is to be used to submit comments on Draft 1 of two individual SARs: 1) Proposed Revisions to Existing Standard Number MOD-001-0 dealing with AFC/ATC/TTC; and 2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 dealing with CBM/TRM. Comments must be submitted by **August 08, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "ATC/TTC/CBM/TRM Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**Background Information:**

The Long-Term AFC/ATC Task Force (LTATF) was formed to develop specific recommendations for the calculation and coordination of AFC/ATC with the goal of increasing market liquidity and enhancing grid reliability. The task force’s work was coordinated with NAESB to separate business practices from reliability concerns. The LTATF evaluated the results of the short-term recommendations in the Alliant West area for summer 2004, and used this evaluation when considering whether to recommend the Alliant West short-term recommendations continue.

In developing their recommendations the LTATF considered the calculation for AFC/ATC, communication and coordination of AFC/ATC, and consistency between transmission planning and AFC/ATC calculations. A final LTATF report was presented to the Standing Committees in March 2005. The task force used the report and recommendations to develop proposed standards for ATC/TTC and CBM/TRM. The proposed “Modification to MOD-001-0 Documentation of ATC and TTC Calculation” SAR and “Modification to standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 SAR are the culmination<sup>1</sup> of the LTATF’s work and is the subject matter for this Comment Form.

The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
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**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments:

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: There may be certain practices that could be considered for a NAESB Business Practice, however compliance with it should be voluntary

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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Comments: Aspects of this standard should also apply to Transmission Planner, Transmission Owner, Planning Authority and Regional Reliability Organization.

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments: On page SAR - 4 Clarification is needed providing the direction for the Standard Drafting Team concerning definitions. This portion of the SAR is not written in complete sentences so that it can be completely understood by those who are not on the LTATF. For example, the SAR lists "Daily, Monthly, Yearly TTC". Does the LTATF wish the Standard Drafting Team to prepare definitions for Daily, Monthly, Yearly TTC? The SAR says that the TTC and ATC are defined in standard 1E1. These definitions should be repeated here so that it is clear what the SDT should use as a starting point. ATC is defined in the SAR by an equation. Is this to be added to the definition in 1E1 for ATC or is this already included in the previous definition? Then ATC is listed with no directions. Does the LTATF wish ATC to be defined, ATC definition to change, or something else? The SAR needs to be specific as to which definitions the SAR drafting team thinks needs to be added, deleted, or changed. If changes are needed, the SAR needs to explain what sort of changes are required.

COMMENTS TO MOD-001-0

R1 - Revise the first paragraph to read " Each Transmission Provider shall develop and document a TTC and ATC (may include the calculation of AFC) methodology, and require coordination between the

**SAR Comment Form**  
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**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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Transmission Providers, with oversight by the respective RRO's." We do not see the need for a RRO region wide methodology, but do see the need for the RRO to review the methodology the Transmission Providers use to insure it meets the requirements of this standard. The regional methodology would need to be at a high level even with the exclusion of RTO/ISO members. MRO members include ISO and non-ISO members throughout the MRO region. It would be better for reliability to have the MRO review the Transmission Provider methodology for the items included in the standard then to have a high level regional methodology for non-ISO/RTO members.

R1.1 - Revise the first sentence to read "Include a narrative explaining how TTC and ATC values are determined and how those values are used in evaluating a transmission service request (TSR), and how the results of the TSR evaluation are made available to customers."

R1.2 - Please clarify what the explanation in the second sentence is meant to accomplish.

R1.7.1 - We would recommend revising the 13 month time frame to 12 months, to reflect seams agreements presently in place.

R1.7.2 - The update frequency should at least be seasonal.

R1.7.3 - We would recommend revising the 13 month time frame to 12 months, to reflect seams agreements presently in place.

R1.9 - Add "(Netting)" after "Transmission Reservations".

R1.12 - Revise the article to have the RRO provide authorization for a variance to the regionally approved Transmission Provider's ATC/TTC methodology. Variances to the MRO approval do not require NERC approval.

R3 should be combined with R1.1

Section C. Measures should be as follows:

M1. Each group of transmission service providers within a region, in conjunction with the members of that region, shall jointly develop and implement a procedure to review changes periodically (at least annually) and ensure that that TTC and ATC/AFC calculations and resulting values of member transmission providers

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**and MOD-009-0**

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comply with the Regionally approved Transmission Provider TTC and ATC methodology, the NERC Planning Standards, and applicable RRO criteria.

M2. A review to verify that the AFC/TTC calculations are consistent with the TO's/TP's planning criteria is also required. The procedure used to verify the consistency must also be documented in the report. Documentation of the results of the most current reviews shall be provided to NERC within 30 days of compliance.

M3. Each entity responsible for the TTC and ATC methodology, in conjunction with its member(s) and stakeholders, shall have and document a procedure on how stakeholders can input their concerns or questions regarding the TTC and ATC methodology and values of the transmission provider(s), and how these concerns or questions will be addressed. Documentation of the procedure shall be available on a web site accessible by the Regions, NERC, and the stakeholders in the electricity market.

M4. The RRO must review and approve the ATC/TTC methodology so as to ensure it is consistent with the RRO's Planning and Operating Criteria.

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**and MOD-009-0**

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: Some Reserve Sharing Pools utilize CBM to insure transfer capability is available for movement of emergency energy. Without CBM, this may not be possible resulting in significant reliability issues.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: There may be certain practices that could be considered for a NAESB Business Practice, however compliance with it should be voluntary.

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

No

Comments: Aspects of this standard should also apply to Transmission Planner, Transmission Owner, Planning Authority and Regional Reliability Organization

**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: COMMENTS TO MOD-004-0

R1 - Revise the first paragraph to read " Each Transmission Provider shall develop and document a CBM methodology, and require coordination between the transmission providers, with oversight by the respective RRO's." We do not see the need for a RRO region wide methodology, but do see the need for the RRO to review the methodology the Transmission Providers use to insure it meets the requirements of this standard. The regional methodology would need to be at a high level even with the exclusion of RTO/ISO members. For example the MRO members include ISO and non-ISO members throughout the MRO region. It would be better for reliability to have the MRO review the Transmission Provider methodology for the items included in the standard than to have high-level regional methodology for non-ISO/RTO members.

R1.2 - In bullets 1 and 2 the word "must" should be deleted. It is not necessary.

The article numbering after R1.6 is in error. It drops back to R1.4, when it should be R1.7.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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Under present article number R1.4, Revise the first sentence to "Describe the formal process and rationale for the RRO to grant any variances to an individual transmission provider's regionally approved CBM Methodology." R1.6.1 should be deleted. The RRO approves variances.

Under the present article number R1.7 - Clarify what the objective is for the "simultaneous application of CBM and TRM." Is this intended to make sure that reserves are not double counted?

It is not stated if Measures M1 and M2 are kept or not. Please confirm that they are still in force.

COMMENTS TO MOD-005-0

R1 - Revise the first sentence to read "Each RRO in conjunction with its members, shall develop and implement a procedure to review changes (at least annually) to the CBM calculations and the resulting values of member Transmission Service Providers."

R1.3 - We believe R1.3.1 should be incorporated into the standard.

COMMENTS TO MOD-006-0

We are not opposed to making this standard a Business Practice, as long as the Business Practice is voluntary.

COMMENTS TO MOD-008-0

R1 - Revise the first sentence of the paragraph to read " Each Transmission Provider in a region shall develop and document, in conjunction with the members of the region, a TRM methodology, and require coordination between the transmission providers, with oversight by the respective RRO's." We do not see the need for a RRO region wide methodology, but do see the need for the RRO to review the methodology the Transmission Providers use to insure it meets the requirements of this standard. The regional methodology would need to be at a high level even with the exclusion of RTO/ISO members. For example the MRO members include ISO and non-ISO members throughout the MRO region. It would be better for reliability to have the MRO review the Transmission Provider methodology for the items included in the standard than to have high-level regional methodology for non-ISO/RTO members.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

R1.3.10 should be renumbered to R1.3.9. The article that was numbered R1.3.9 should be placed at the end of the list and not have a number.

R1.5 - Revise the first sentence to "Describe the formal process and rationale for the RRO to grant any variances to an individual transmission provider's regionally approved TRM Methodology." R1.5.1 should be deleted. The RRO approves variances.

R1.7 - Clarify what the objective is for the "simultaneous application of CBM and TRM." Is this intended to make sure that reserves are not double counted?

COMMENTS TO MOD-009-0

R1 - Revise the first sentence of the paragraph to read " The RRO in a region shall develop and document, in conjunction with the members of the region, a procedure to, at least annually, review the TRM calculations and the resulting values of member transmission providers, to ensure that they comply with the regionally approved transmission provider methodologies." We do not see the need for a RRO region wide methodology, but do see the need for a region-wide process to review the methodology the Transmission Providers use to insure it meets the requirements of this standard. The regional methodology would need to be a high level even with the exclusion of RTO/ISO members. For example the MRO members include ISO and non-ISO members throughout the MRO region. It would be better for reliability to have the MRO review the Transmission Provide methodology for the items included in the standard than to have high-level regional methodology for non-ISO/RTO members.

R1.1 - Change the article to ". . . implemented, and made available to the RRO's, NERC, and stakeholders."

R1.4 - Combine this article into R1.3.

R4 - Delete as it is included in the revised R1.1.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
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This form is to be used to submit comments on Draft 1 of two individual SARs: 1) Proposed Revisions to Existing Standard Number MOD-001-0 dealing with AFC/ATC/TTC; and 2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 dealing with CBM/TRM. Comments must be submitted by **August 08, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "ATC/TTC/CBM/TRM Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Matt Schull
Organization:	North Carolina Municipal Power Agency Number 1
Telephone:	919-760-6312
Email:	mschull@electricities.org
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**Background Information:**

The Long-Term AFC/ATC Task Force (LTATF) was formed to develop specific recommendations for the calculation and coordination of AFC/ATC with the goal of increasing market liquidity and enhancing grid reliability. The task force’s work was coordinated with NAESB to separate business practices from reliability concerns. The LTATF evaluated the results of the short-term recommendations in the Alliant West area for summer 2004, and used this evaluation when considering whether to recommend the Alliant West short-term recommendations continue.

In developing their recommendations the LTATF considered the calculation for AFC/ATC, communication and coordination of AFC/ATC, and consistency between transmission planning and AFC/ATC calculations. A final LTATF report was presented to the Standing Committees in March 2005. The task force used the report and recommendations to develop proposed standards for ATC/TTC and CBM/TRM. The proposed “Modification to MOD-001-0 Documentation of ATC and TTC Calculation” SAR and “Modification to standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 SAR are the culmination<sup>1</sup> of the LTATF’s work and is the subject matter for this Comment Form.

The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

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		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: ATC/TTC/AFC calculations should be standardized across all regions. The way the SAR is written now, TSPs within a region will be required to coordinate methodology and calculations, but the regions will not be required to coordinate with each other. Without standardized calculations and coordination between regions, we will continue to have differences in regional ATC/TTC/AFC values and limit commercial activity. Rather than having calculation differences between neighboring TSPs as it is today, it will just be pushed up to the regional level and the problem of uncoordinated ATC/TTC/AFC values will remain.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: The scope should include standardized ATC/TTC/AFC calculations and required coordination between regions.

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments:

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments:

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Paul B. Johnson
Organization:	Chairman, ATC Task Force of NERC Planning Committee
Telephone:	614-552-1670
Email:	pjohnson@aep.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
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		R1.4	Add/Delete Language
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		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
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		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

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**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments: Yes – It is important to recognize that while AFC/ATC/TTC are not indicators of reliability, AFC/ATC/TTC values are limited by NERC standards and definitions, Regional criteria, and the physical characteristics of the interconnected electric systems. The proper calculation and use of AFC/ATC/TTC are critical to maintaining system reliability.

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: No – The NERC Planning Committee encourages further standardization of certain key elements and parameters in the calculation of ATC, AFC, and TTC. The proposed standards on ATC, AFC, and TTC calculations must require that key elements of the calculation critical to reliability be incorporated into any proposed NERC ATC and TTC standard methodology and strengthened for increased consistency.

The existing NERC ATC and TTC methodology prescribes a set of requirements that must be addressed in calculating ATC and TTC values. While the current methodology provides a degree of commonality in the calculations, that commonality needs to be strengthened. This strengthening of the calculation requirements refers to additions and refinements to the elements or parameters to be addressed in the calculation methodology and not to the tools or equipment used for the calculations.

Some examples of the elements critical to reliability and for which further standardization in the ATC and TTC calculations should be required include: 1) coordination in the exchange and use of system data within the Regions and among adjacent Regions, 2) the monitoring of critical limiting transmission facilities under appropriate contingencies consistent with planning and operating criteria, 3) consistency in the manner in which transmission services are reserved, scheduled, and accounted in the calculations, 4) using appropriate generation dispatches, 5) meeting a minimum frequency of ATC and TTC calculations, 6) base case model building (i.e., what data needs to be incorporated and updated), 7) ATC and TTC calculators (those who are responsible for calculating ATC and TTC values) who impact each other's transmission system must have appropriate and adequate model representation (load level, generation dispatch, transmission and generation outages) of each other's system, and 8) monitoring of transmission facilities based on the use of an appropriate distribution cutoff factor.

Further, AFC (available flowgate capability) must be clearly defined. The NERC ATC and TTC methodology must be expanded to include and describe the key elements that must be addressed in the calculation of AFC values. In addition, the relationship of AFC to ATC and TTC must be clearly defined along with the manner in which they will be used and coordinated in accounting for transmission reservations and schedules.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: No – Please see comments provided in response to Question 2.

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: Yes – The business process flow of requesting transmission service, the evaluation of a transmission service request against the calculated ATC, TTC, or AFC values, and the communication of the resulting service to the transmission user are possible elements to be considered in business practice standards. In developing the business practices, care must be taken to ensure that the tools or equipment to implement this process flow not be specified, only the process flow. All aspects dealing with reliability must be handled by NERC.

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: No – Aspects of this standard also should apply to the Transmission Planner, Transmission Owner, Planning Authority, and Regional Reliability Organization.

In those areas where Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), or other agents, such as Transmission Service Coordinators (TSCs), are involved with ATC, TTC, and AFC calculations for multiple Regions or portions thereof, the role of these entities must be clearly defined.

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments: Yes – In the SAR or standard drafting of the proposed ATC/TTC standard, definitions must be established, as necessary, for industry acceptance so that a common language is used in reference to ATC and TTC. In particular, definitions for “flowgate,” “flowgate rating,” and “Available Flowgate Capability (AFC)” need to be established (See also the fourth paragraph in response to Question 2.) since these terms have never been formally defined by NERC.

On pages SAR - 4 and SAR – 9, further clarification and direction are needed for the Standard Drafting Team (SDT) concerning definitions. This portion of the SAR is not written in complete sentences and therefore may not be completely understood by those who were not on the LTATF. For example, the SAR lists “Daily, Monthly, Yearly TTC.” Does the LTATF wish the Standard Drafting Team to prepare definitions for Daily, Monthly, Yearly TTC and ATC? The SAR says that the TTC and ATC are defined in standard 1E1. These definitions should be repeated here so that it is clear what the SDT should use as a starting point. ATC is defined in the SAR by an equation. Is this to be added to the definition in 1E1 for ATC or is this already included in the previous definition? Then, Existing Transmission Commitments (ETC) is listed with no directions. Does the LTATF wish ETC to be defined, ETC definition to change, or something else? The SAR needs to be specific as to which definitions the SAR

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**and MOD-009-0**

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drafting team recommends to be added, deleted, or changed. If changes are needed, the SAR needs to explain what sorts of changes are required.

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments: No additional data elements.

**8. Do you have any other comments on these proposed standards?**

Comments: Yes - The ATC/TTC SAR needs to be reworded to clearly establish the following:

- 1) A Regional ATC/TTC methodology must be developed in conjunction with Regional members.
- 2) All ATC/TTC calculators must abide by the Regional methodology for the Region in which they are members.
- 3) RTOs and ISOs that encompass multiple Regional Reliability Organizations are exempt from abiding by the Regional ATC/TTC methodology provided they have established a single ATC/TTC calculation methodology, in conjunction with their membership, for the entire RTO or ISO. These RTO or ISO methodologies must be consistent with the requirements of the NERC ATC/TTC standard and applicable Regional criteria.
- 4) RTOs and ISOs that are exempt from the Regional methodologies must perform reviews to ensure consistency between the RTO or ISO ATC /TCC calculation methodology and their members' transmission planning and operating criteria. If this requirement is not added, there is no check on the consistency with planning and operating criteria for members who are not under the Regional methodology but under an RTO or ISO ATC/TCC methodology. This requirement will help to ensure that ATC/TTC calculations only incorporate contingencies, TRM components, and CBM for which the systems are reinforced and planned.
- 5) Each RRO must review and approve the RTO or ISO ATC/TTC methodology to ensure that it is consistent with the NERC ATC/TTC standard and the RRO's planning and operating criteria. If this requirement is not added, there appears to be no check of an RTO or ISO's ATT/TCC methodology.

R1.1 – Revise the first sentence to read “Include a narrative explaining how TTC and ATC values are determined and how those values are used in evaluating a transmission service request (TSR), and how the results of the TSR evaluation are made available to customers.”

R1.7.2 – The update frequency should at least be seasonal.

R3 – This requirement should be combined with R1.1.

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments: Yes - There is a reliability need for the CBM/TRM standard. Please see the comments provided in response to Question 10 below.

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: Yes – Earlier in the development of this industry, there were predominantly local, vertically integrated electric utilities. Each utility built sufficient generation to serve its own load responsibility. Transmission interconnections with neighboring utilities were typically established for one of the following reasons: 1) to minimize duplication of transmission (i.e., tie to neighbor for transmission reliability), and 2) an economic decision, to build transmission instead of generation based on the generation reliability criteria for which the utility planned (i.e., tie to neighbor to meet generation reliability criteria). This second reason is the origin of the CBM concept. Transmission interconnections provide each interconnected system with access to its neighbors so that in the event of an extreme generation outage within a utility, the temporarily generation deficient utility could have access to “emergency” generation resources from its interconnected neighbors. CBM is the quantification of this use of the transmission system. Therefore, CBM is an “emergency” use transmission quantity and only exists on the importing system for use only during periods of an emergency generation deficiency when firm transmission service is not available. Just as transmission capacity is preserved for the transmission contingencies for which a utility plans, transmission capacity is also preserved for the generation contingencies for which a utility plans. In either case, the utility customers paid for the transmission capacity that was installed to maintain the reliability level that is planned, via their rates for service.

Some reserve sharing pools utilize CBM to ensure transfer capability is available for movement of emergency energy. Without CBM, this may not be possible, resulting in significant reliability issues.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: Yes – The scope of the standard is sufficient for the industry at this time.

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: Yes – The process under which CBM is used may be considered a business practice that could be handled by NAESB. However, the calculation of CBM amounts and how they are implemented in an ATC/TCC calculation are reliability issues that belong in the CBM/TRM standard.

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**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: No – Aspects of this standard also should apply to the Transmission Planner, Transmission Owner, Planning Authority, and Regional Reliability Organization.

In those areas where Regional Transmission Organizations (RTOs), Independent System Operators (ISOs), or other agents, such as Transmission Service Coordinators (TSCs), are involved with ATC, TTC, and AFC calculations for multiple Regions or portions thereof, the role of these entities must be clearly defined.

**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments: No – In the SAR or standard drafting of the proposed CBM/TRM standard, definitions must be established, as necessary, for industry acceptance so that a common language is used in reference to CBM and TRM.

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments: No additional data elements.

**16. Do you have any other comments on these proposed standards?**

Comments: Yes – The CBM/TRM SAR needs to be reworded to clearly establish the following:

- 1) A Regional CBM/TRM methodology must be developed in conjunction with Regional members.
- 2) All entities calculating CBM and/or TRM must abide by the Regional methodology for the Region in which they are members.
- 3) RTOs and ISOs that encompass multiple Regional Reliability Organizations are exempt from abiding by the Regional CBM/TRM methodologies provided they have established a single CBM and/or TRM calculation methodology, in conjunction with their membership, for the entire RTO or ISO. These RTO or ISO methodologies must be consistent with the requirements of the NERC CBM/TRM standard and applicable Regional criteria.
- 4) RTOs and ISOs that are exempt from the Regional methodologies must perform reviews to ensure consistency between the RTO or ISO CBM and/or TRM calculation methodologies and their members' transmission planning, generation planning, and operating criteria. If this requirement is not added, there is no check on the consistency with planning and operating criteria for members who are not under the Regional methodology but under an RTO or ISO CBM and/or TRM methodology.
- 5) In addition, the text in section R1 of the SAR needs to be revised to clarify that the following reviews are to be performed by the RRO. First, each RRO needs to review the CBM and/or TRM calculations of transmission providers under the Regional methodology to ensure they are adhering to the Regional methodology. Second, each RRO must review and approve the RTO and ISO CBM and/or TRM methodologies to ensure they are consistent with the NERC CBM/TRM standard and the RRO's planning and operating criteria. Finally, the RRO is responsible for ensuring that TRM calculations performed by transmission service providers, regardless of what methodology they are under, are consistent with the individual transmission owner's planning criteria.

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COMMENTS TO MOD-004-0

R1.2 – In bullets 1 and 2, the word “must” should be deleted. It is not necessary.

Under the present article number R1.7 – Clarify what the objective is for the “simultaneous application of CBM and TRM.” Is this intended to make sure that reserves are not double counted?

COMMENTS TO MOD –008-0

R1.7 – Clarify what the objective is for the “simultaneous application of CBM and TRM.” Is this intended to make sure that reserves are not double counted?

COMMENTS TO MOD- 009-0

R1.4 – Combine this article into R1.3.

R4 – Delete, as it is included in the revised R1.1.

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This form is to be used to submit comments on Draft 1 of two individual SARs: 1) Proposed Revisions to Existing Standard Number MOD-001-0 dealing with AFC/ATC/TTC; and 2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 dealing with CBM/TRM. Comments must be submitted by **August 08, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "ATC/TTC/CBM/TRM Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Guy V. Zito
Organization:	Northeast Power Coordinating Council
Telephone:	212-840-1070
Email:	gzito@npcc.org
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



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**Background Information:**

The Long-Term AFC/ATC Task Force (LTATF) was formed to develop specific recommendations for the calculation and coordination of AFC/ATC with the goal of increasing market liquidity and enhancing grid reliability. The task force’s work was coordinated with NAESB to separate business practices from reliability concerns. The LTATF evaluated the results of the short-term recommendations in the Alliant West area for summer 2004, and used this evaluation when considering whether to recommend the Alliant West short-term recommendations continue.

In developing their recommendations the LTATF considered the calculation for AFC/ATC, communication and coordination of AFC/ATC, and consistency between transmission planning and AFC/ATC calculations. A final LTATF report was presented to the Standing Committees in March 2005. The task force used the report and recommendations to develop proposed standards for ATC/TTC and CBM/TRM. The proposed “Modification to MOD-001-0 Documentation of ATC and TTC Calculation” SAR and “Modification to standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 SAR are the culmination<sup>1</sup> of the LTATF’s work and is the subject matter for this Comment Form.

The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

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**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
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**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

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**and MOD-009-0**

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments: TTC and TRM are reliability driven quantities however ATC/AFCs are quantities that are based on market rules and used in the managing of system congestion. ATC/AFC calculations are not required to achieve Reliability

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: Although it is agreed that the proposed scope is sufficient to address reliability objectives, we disagree that there needs to be a standard outlining the method for calculation of ATC/AFC. There are different market structures in the Northeast and the processes need to be coordinated to ensure they work together to achieve a transparent, documented methodology to calculate those quantities that are critical to maintaining reliability objectives.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: See above comments

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: ATC/AFC system quantities that are market specific should be addressed by NAESB

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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**5. Do you agree with the list of entities to which the standard would apply?**

- Yes  
 No

Comments: Aspects of this standard will also apply to Transmission Planner, Planning Authority and Regional Reliability Organization

**6. Do you have any other terms that should be included in the definitions?**

- Yes  
 No

Comments: NATC and RATC should be defined by NAESB

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

- Yes  
 No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments:

General Comment: It must be noted that the application of ATC, and therefore its derivation, can be significantly different in market-based jurisdictions that do not take physical transmission reservations, and those that do. The principles that "An Organization Standard shall neither mandate nor prohibit any specific market structure" and "An Organization Standard shall not preclude market solutions to achieving compliance with that standard" must be maintained. The Standards Drafting Team must be familiar with the market structures in use in North America, to accommodate these variances

Items for the Standard Drafting team to consider with respect to the proposed wording:

- R1 is very confusing with it's reference to how the methodology must be documented. It seems to leave a hole that does not require RTO/ISOs to post their methodology. While there may be more than one methodology applicable in a region, it should be required that the methodology for every TP in the RRO be available on the RRO website.
- R3 is duplicative and should be deleted
- We do not understand why Generation Dispatch orders are required for TTC/ATC coordination, Generation Outage coordination should be adequate

**SAR Comment Form**  
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- It is unclear in the SAR what the intent is of the Appendix. We do not support the definitions shown being included in the standard.

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: While not all TPs use CBM, those that do use it for reliability reasons.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: Aspects of this standard will also apply to Transmission Planner, Planning Authority and Regional Reliability Organization

**SAR Comment Form**  
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**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: Items for the Standard Drafting team to consider with respect to the proposed wording:

- R1 of MOD-004 and MOD-008 seem confusing and not to require an ISO/RTO to post their methodology.

While there may be more than one methodology applicable in a region, it should be required that the methodology for every TP in the RRO be available on the RRO website

- R1.8.1 MOD-008 implies that TRM is set as a fixed amount which must be maintained through time, since entities would be required to "plan and reinforce the transmission system for the amount of TRM being preserved". We feel that this is an inappropriate requirement, since TRM represents a variable quantity based on known system conditions plus uncertainty.

- R1.8.2 of MOD-008 is not related to item 1.8 and should be moved in the text to be before and applicable to all R1.x requirements.

In Summary, NPCC concerns are as follows-

a) Québec Area is not synchronously interconnected with the rest of the Eastern Interconnexion thus i) coordination requirements are limited within its synchronous system, ii) ultimate source and sink are limited within its synchronous system

b) NY's, NE's, IESO 's transmission commitments are not based point to point transmission reservations in both operating and planning horizon thus posting requirement will not include ATC based on physical reservation and we believe that ATC is a market based quantity.

c) CBM is more or less a physical reservation made, at no cost, by LSEs within the boundaries of the TP's system. Therefore for some members of NPCC, because they have market based systems and are not using physical reservations, feel a standard NERC Standards for CBM is not necessary.

d) Some of NPCC's Areas have confidentiality issues especially with Generator outage schedules and we are asking the drafting team to be cognizant of these and respect this confidentiality.

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  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Mike Calimano
Organization:	NYISO
Telephone:	518 356 6129
Email:	mcalimano@nyiso.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input checked="" type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



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**Background Information:**

The Long-Term AFC/ATC Task Force (LTATF) was formed to develop specific recommendations for the calculation and coordination of AFC/ATC with the goal of increasing market liquidity and enhancing grid reliability. The task force’s work was coordinated with NAESB to separate business practices from reliability concerns. The LTATF evaluated the results of the short-term recommendations in the Alliant West area for summer 2004, and used this evaluation when considering whether to recommend the Alliant West short-term recommendations continue.

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The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: Coordination and documentation of the calculation method would improve transparency. Standardization, however, must recognize the inherent differences between systems which employ physical transmission reservations and energy markets which use financial congestion management and not be prescriptive.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

No

Comments:

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments:

Secion R.1.7 - all data listed should be considered confidential and used for the purposes of RC reliability studies.

Secion R.1.7.2 - please clarify what is meant by Generation Dispatch Order and why it is needed?

Section R.1.7.6 - please explain why this document specifies the use of tool, namely SDX, while other NERC standards such as coordinated operations are not requiring the use of a specific software tool.

**SAR Comment Form**  
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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: In the operation horizon the NYISO does not use CBM, however, we agree that areas that employ a non-zero CBM should coordinate and document the process.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments:

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input checked="" type="checkbox"/> 5 - Electric Generators
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<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input checked="" type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**SAR Comment Form**  
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		R1.12	Add Requirement
		R2	Add/Delete Language
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2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
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		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
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		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
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**and MOD-009-0**

---

**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: The standard should focus on increasing the transparency of study assumptions and methods utilized by each Transmission Service Provider (TSP), rather than attempt to prescribe or mandate the exact procedures and assumptions used in the calculation of TTC/ATC/AFC by all TSPs. Additionally, this standard should increase communication around and the coordination of transfer capability calculations. Determination of ATC is already defined within each FERC-jurisdictional TSP's Open Access Transmission Tariff (Attachment C of the pro-forma OATT). There is no reliability need to mandate a prescribed detailed procedure and assumptions for calculating TTC/ATC/AFC.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: See comments in response to Question 2 above. In addition, clarification should be provided with respect to the applicability of any portions of a standard to either short-term and long-term service (as defined in FERC Order 888, 889, 638, etc.) TTC/ATC study methods. The scope is too broad in terms of requiring data that is commercially sensitive (e.g., generation dispatch order); any data to be shared should be adequately protected; and data only needs to be made available if it is truly relevant to the study process.

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

**SAR Comment Form**  
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**and MOD-009-0**

---

Yes

No

Comments: We would like to emphasize that CBM should remain in this standard due to it being a critical component of Grid reliability and should not become a business practice in a NAESB standard.

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: RTO/ISOs should be required to provide the same documentation for their assumptions and methods.

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments: It should be pointed out that this standard should contain consistent definitions, including but not limited to, ATC, AFC, TTC, CBM, and TRM. The definitions should be developed as part of the industry effort of this standard.

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments: While this SAR suggests that individual transmission owners and operators within an RTO or ISO may be exempt from developing and documenting a regional methodology for TTC/ATC/AFC determination, we expect that the RTO/ISO would not be exempt from clearly documenting their assumptions and methods. Maintaining this requirement will help to ensure the same transparency exists for the RTO/ISO footprint as in other regions.

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**and MOD-009-0**

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

- Yes  
 No

Comments: There is a reliability need for communication and coordination of TTC, CBM, and TRM determination, but no reliability need exists for every Transmission Service Provider to utilize the exact same methods to determine these values.

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

- Yes  
 No

Comments: Availability of CBM is an integral part of overall system reliability for each entity that relies on it as part of its generation adequacy calculations.

**11. Do you agree with the scope of the proposed standard?**

- Yes  
 No

Comments: As with the SAR for MOD-001-0, the scope of this SAR goes beyond what is required for system reliability. There is no reliability need to prescribe in detail how each entity should calculate either TRM or CBM. There is a need to ensure transparency in the methodology used by each entity but not in the specific components of the calculation.

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

- Yes  
 No

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
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**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: RTO/ISOs should be required to provide the same documentation for their assumptions and methods.

**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments: Please define "Calculation Model" as described in requirement R1.7.9.

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: If this standard is developed beyond the transparency issue, the methodology should only mandate that certain guiding principles be considered in the determination of TRM and CBM and not that a industry-wide prescriptive set of calculations be made. Also it should be up to each entity with responsibility for their own system reliability and generation adequacy on how internal generation should be considered in the determination of CBM and thus generation adequacy within their system.

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<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	
<input type="checkbox"/> WECC	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> NA - Not Applicable		



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The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments: The standard should focus on increasing the transparency of study assumptions and methods utilized by each Transmission Service Provider (TSP), rather than attempt to prescribe or mandate the exact procedures and assumptions used in the calculation of TTC/ATC/AFC by all TSPs. Determination of ATC is already defined within each FERC-jurisdictional TSP's Open Access Transmission Tariff (Attachment C of the pro-forma OATT). There is no reliability need to mandate a prescribed, detailed procedure and assumptions for calculating TTC/ATC/AFC.

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments: See comments in response to Question 2 above. Additionally, clarification should be provided with respect to the applicability of any portions of a standard to either short-term and long-term (service as defined in FERC Order 888, 889, 638, etc.) TTC/ATC study methods. The scope is too broad in terms of requiring data that is commercially sensitive (e.g., generation dispatch order); any data to be shared should be adequately protected; and data only needs to be made available if it is truly relevant to the study process.

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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No

Comments: We believe CBM should remain in this standard due to it being a critical component of Grid reliability and should not become a business practice in a NAESB standard.

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments: No. See comment in Question #8.

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments: While this SAR suggests that individual transmission owners and operators within an RTO or ISO may be exempt from developing and documenting a regional methodology for TTC/ATC/AFC determination, we expect that the RTO/ISO would not be exempt from clearly documenting their assumptions and methods. Maintaining this requirement will help to ensure the same transparency exists for the RTO/ISO footprint as in other regions.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

- Yes  
 No

Comments: There is a reliability need for communication and coordination of TTC, CBM, and TRM determination, but no reliability need exists for every Transmission Service Provider to utilize the exact same methods to determine these values.

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

- Yes  
 No

Comments: Availability of CBM is an integral part of overall system reliability for each entity that relies on it as part of its generation adequacy calculations.

**11. Do you agree with the scope of the proposed standard?**

- Yes  
 No

Comments: As with the SAR for MOD-001-0, the scope of this SAR goes beyond what is required for system reliability. There is no reliability need to prescribe in detail how each entity should calculate either TRM or CBM. There is a need to ensure transparency in the methodology used by each entity, but not in the specific components of the calculation.

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

- Yes  
 No

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**13. Do you agree with the list of entities to which the standard would apply?**

- Yes  
 No

Comments: Similar to the comments supplied in response to Question 8, we expect that all regions will be expected to clearly document their assumptions and methods, regardless of operational or organizational structure, in order to ensure transparency.

**14. Do you have any other terms that should be included in the definitions?**

- Yes  
 No

Comments: Please define "Calculation Model" as described in requirement R1.7.9.

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

- Yes  
 No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: If a standard is developed that extends beyond the basic assurance of transparency, any resulting method should only mandate that certain guiding principles be considered in the determination of TRM and CBM - rather than mandate that a prescriptive set of calculations be made. Furthermore, each entity responsible for the generation adequacy of their system should be the one to determine how best to consider their own internal generation for use in the determination of an appropriate CBM value for that specific system.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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This form is to be used to submit comments on Draft 1 of two individual SARs: 1) Proposed Revisions to Existing Standard Number MOD-001-0 dealing with AFC/ATC/TTC; and 2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 dealing with CBM/TRM. Comments must be submitted by **August 08, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "ATC/TTC/CBM/TRM Comments" in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do enter text only, with no formatting or styles added.
  - Do use punctuation and capitalization as needed (except quotations).
  - Do use more than one form if responses do not fit in the spaces provided.
  - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
  - Do not use numbering or bullets in any data field.
  - Do not use quotation marks in any data field.
  - Do not submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>	
(Complete this page for comments from one organization or individual.)	
Name:	Christopher Plante
Organization:	WPS Resources
Telephone:	920-433-1290
Email:	cplante@wpsr.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input checked="" type="checkbox"/> 4 - Transmission-dependent Utilities
<input checked="" type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	



**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**Background Information:**

The Long-Term AFC/ATC Task Force (LTATF) was formed to develop specific recommendations for the calculation and coordination of AFC/ATC with the goal of increasing market liquidity and enhancing grid reliability. The task force’s work was coordinated with NAESB to separate business practices from reliability concerns. The LTATF evaluated the results of the short-term recommendations in the Alliant West area for summer 2004, and used this evaluation when considering whether to recommend the Alliant West short-term recommendations continue.

In developing their recommendations the LTATF considered the calculation for AFC/ATC, communication and coordination of AFC/ATC, and consistency between transmission planning and AFC/ATC calculations. A final LTATF report was presented to the Standing Committees in March 2005. The task force used the report and recommendations to develop proposed standards for ATC/TTC and CBM/TRM. The proposed “Modification to MOD-001-0 Documentation of ATC and TTC Calculation” SAR and “Modification to standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 SAR are the culmination<sup>1</sup> of the LTATF’s work and is the subject matter for this Comment Form.

The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

**Tabular Summary of Requirement Changes**

<b>SAR</b>	<b>Existing Standard</b>	<b>Requirement</b>	<b>Change</b>
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

<sup>1</sup> The LTATF also developed a proposed business practice that was submitted to NAESB.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0**

**1. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?**

Yes

No

Comments:

**3. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: NAESB business practice R05004.

**5. Do you agree with the list of entities to which the standard would apply?**

Yes

No

Comments:

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

**6. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?**

Yes

No

Comments:

**8. Do you have any other comments on these proposed standards?**

Comments: As written, the proposed standards do not require an RTO/ISO to develop and document an AFC/TTC/ATC methodology consistent with the standards. Section B (R1) must include language to ensure that the standard also applies to an RTO/ISO performing AFC/TTC/ATC calculations.

Throughout the proposed standard, there is not a consistent reference to AFC and TTC/ATC. For example, some areas of the SAR refer only to AFC and other areas refer to TTC/ATC. All requirements of the proposed standard should apply to all three quantities, AFC/TTC/ATC.

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

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**CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0**

**9. Is there a reliability need for the proposed standard?**

Yes

No

Comments:

**10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?**

Yes

No

Comments: But, only to the extent that the resource adequacy requirement of the CBM region assumes support from external resources AND the transmission system of the CBM region is planned and built to accommodate the CBM amount.

**11. Do you agree with the scope of the proposed standard?**

Yes

No

Comments:

**12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?**

**Note: NAESB has a proposal for companion business practice - R05004)**

Yes

No

Comments: NAESB business practice R05004.

**13. Do you agree with the list of entities to which the standard would apply?**

Yes

No

**SAR Comment Form**  
**Proposed Revisions to Existing Standard Number MOD-001-0**  
**and**  
**Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,**  
**and MOD-009-0**

---

Comments:

**14. Do you have any other terms that should be included in the definitions?**

Yes

No

Comments:

**15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?**

Yes

No

Comments:

**16. Do you have any other comments on these proposed standards?**

Comments: As written, the proposed standards do not require an RTO/ISO to develop and document a CBM/TRM methodology consistent with the standards. Section R1 of MOD-004-00 must include language to ensure that the standard also applies to an RTO/ISO performing CBM/TRM calculations.

Within section R1.5 (note numbering error in this section of the SAR) of the CBM methodology (allocation of CBM to interfaces), the methodology should require the specification and rationale for the selection of source and sink points to simulate the import of the CBM amount, if a simulation is performed. The source and sink points must be consistent with those used by the transmission owner/service provider in their CBM planning studies.

The CBM/TRM SAR should include a requirement that the methodology specify how CBM/TRM is incorporated in the AFC/ATC/TTC calculations (firm, nonfirm, or both). If CBM/TRM is applied within a market structure that utilizes a security constrained centrally dispatch system (locational marginal pricing), the SAR should require that the CBM/TRM methodology specify how it is applied in financial transmission rights models, day-ahead models, and real-time models.