

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

Please use this form to submit comments on the proposed Supplemental SAR for Revisions to MOD-001 through MOD-009; FAC-012 through FAC-013. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "ATC Supplement SAR" in the subject line. If you have questions please contact **Andy Rodriquez** at [Andy.Rodriquez@nerc.net](mailto:Andy.Rodriquez@nerc.net) or by telephone at 609-947-3885.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	E. Nick Henery	
Organization:	APPA	
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E-mail:	nhenery@APPAnet.org	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input checked="" type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## **Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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### **Background Information**

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In addition to making all required modifications to MOD-001, MOD-004, and MOD-008, the following standards may be modified, transferred to NAESB, or retired in accordance with stakeholder comments and FERC directives:

- FAC-012 – Transfer Capability Methodology
- FAC-013 – Establish and Communicate Transfer Capabilities
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- MOD-003 – Procedure for Input on TTC and ATC Methodologies and Values
- MOD-007 – Documentation of the Use of CBM

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**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments: The Supplemental SAR is incomplete and vague in directing the SDT as to its objective in providing new standards that will insure and/or improve the reliability of the BES.

2. Please provide any other comments you have on the SAR.

Comments: The Following attach file contains modified versions of the Supplemental SAR sections that explains in detail the objective of the Supplemental SAR. These are recommended changes to SAR. See the Attached File with the recommended Changes.

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Greg Rowland	
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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## **Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments:

2. Please provide any other comments you have on the SAR.

Comments:

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments: While the summary of FERC Directives contained on pages SAR-6 and SAR-7 appears very complete, the summary uses a shorthand notation that it is somewhat cryptic and difficult to decipher. However, there appear to have been some omissions as follows:

890-237 Consistent practices for calculating TTC/TFC

890-244 In short-term ATC calculations all reserved but unused transfer capability shall be released as non-firm ATC

890-257 Develop standards for CBM determination, allocation and use

890-259 CBM only used to allow LSE to meet its generation reliability criteria

890-293 Approach for accounting for counter flows in ATC standards

890-301 ATC recalculation by TSP on a consistent time interval and in a manner that closely reflects actual system topology

890-354 Unused transfer capability set aside for CBM made available for non-firm use and posted on OASIS

890-416 Posting of load data on LSE or BAA level of granularity rather than RTO/ISO total load

2. Please provide any other comments you have on the SAR.

Comments: Page SAR-2 paragraph FAC-012 and FAC-013 have misspellings "purposes o maintaining" should say "purpose of maintaining."

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments: The SAR will address all of the 77 directives from Orders 693 and 890 that are listed in Attachment 1. It is not clear if this list is comprehensive. Does the list include references have already been handled in the MOD standards currently under review, or does the list only included references yet to be addressed?

2. Please provide any other comments you have on the SAR.

Comments: Is it possible that the proposed SAR drafting team will revise the standards MOD-001, MOD-004, MOD-008, MOD-028, MOD-029 and MOD-030 that are currently under review?

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<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ron Falsetti	
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Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
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1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments: The SAR proposes to address all of the 77 directives from Orders 693 and 890 that are listed in Attachment 1. However, it is not clear if this list is comprehensive. Does the list include references have already been handled in the MOD standards which are currently under review (MOD-001-1, MOD-004-1, MOD-008-1, MOD-028-1, MOD-029-1, and MOD-030-1) or does the list only included those references which are not addressed by the above-mentioned standards under review currently?

2. Please provide any other comments you have on the SAR.

Comments: Is it possible that the proposed SAR drafting team will revise the standards MOD-001, MOD-004, MOD-008, MOD-028, MOD-029 and MOD-030 that are currently under review? It might have been better that this SAR was addressed first and then the mentioned MOD standards if these were to be revised as a result of this supplemental SAR.

We do not agree with making the MOD-004 standard, a cluttered standard. This coupled with the need to make a distinction between the ATC calculation methods used and the descriptive procedure for resource adequacy assessment has made the new MOD-004 very convoluted, and the requirements difficult to follow and measure. If combining some standards of related objective is desired, a more manageable and appropriate alternative is to divide these 4 standards into two groups - one on the determining and verifying the calculation of CBM (Methodology, Assumptions, and Documentation) and the other on the use and reporting of use of CBM (Applicability and Reporting).

The roles of the Reliability Coordinator, Planning Coordinator, Transmission Owner, and the Transmission Service Provider must be clearly articulated in these standards as well as the new MOD standard that will come into effect as a result of FAC-012 and FAC-013.

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Yes

No

Comments: We agree that the SAR is comprehensive in addressing the FERC directives, and that changes to the MOD standards must be made to comply with the directives. However, this SAR is not comprehensive enough to provide the rationale and proposed scope and description on the restructuring of MOD-001, viz. the creation of MOD-028, MOD-029 and MOD-030, and more importantly, the retirement of FAC-012 and -013. And the revised SAR has not gone through a review and comment period before the newly created MOD-028, etc. are posted for comments.

The proposed restructuring of MOD-001, the creation of new standards and the retirement of FAC Standards are substantive changes to the original SAR. As such, the rationale and details need to be provided to the revised SAR and posted for comment. The industry needs to be given an opportunity to comment on the need and appropriateness of splitting the standards in this fashion, and the scope of each of the split standards.

The industry is now asked to comment both on the SAR and the revised and new MOD standards, which in our view makes commenting on the SAR as relates to the development of new MOD Standards almost irrelevant.

2. Please provide any other comments you have on the SAR.

Comments: From a process viewpoint, 3 new standards are created, and two standards are considered to be retired, without a SAR. This SAR that we are commenting on only provides the basis for making changes to address FERC directives, but does not list and provide the rationale for the new standards or the retirement of standards. This doesn't seem to be consistent with the reliability standards development procedure.

Similarly, there is no SAR or any mention in this SAR to combine MOD-004 to MOD-007. This is also a major change to the existing standards. A SAR to provide the rationale for the change, and the proposed scope of the consolidated standard need to be provided for industry comment, with sufficient time before any standard drafting work is done and the revised standards posted.

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<b>Individual Commenter Information</b>	
<b>(Complete this page for comments from one organization or individual.)</b>	
Name:	Brian Thumm
Organization:	ITC
Telephone:	248-374-7846
E-mail:	bthumm@itctransco.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/> 1 — Transmission Owners
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- MOD-007 – Documentation of the Use of CBM

The requesters would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "ATC Supplement SAR" by **June 24, 2007**.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments:

2. Please provide any other comments you have on the SAR.

Comments: This SAR appears to be necessary to inform FERC of potential inconsistencies in the propose standards that might be caused by a small number of the FERC orders. TTC for AFC/ATC does not belong in FAC-012 for example, even though FERC directed this. It's based on a misunderstanding of the original intent of FAC-012. As such, we support any work to clarify the meaning and intent of standards that are needed to meet FERC orders.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

Please use this form to submit comments on the proposed Supplemental SAR for Revisions to MOD-001 through MOD-009; FAC-012 through FAC-013. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "ATC Supplement SAR" in the subject line. If you have questions please contact **Andy Rodriquez** at [Andy.Rodriquez@nerc.net](mailto:Andy.Rodriquez@nerc.net) or by telephone at 609-947-3885.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Michelle Rheault	
Organization:	Manitoba Hydro	
Telephone:	204-487-5445	
E-mail:	mdrheault@hydro.mb.ca	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## **Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

---

### **Background Information**

This SAR is intended to supplement the already approved SARs to modify ATC/TTC/AFC and CBM/TRM. The expanded scope will bring the set of standards into compliance with the latest versions of the Reliability Standards Procedure Manual and the ERO's Sanctions Guidelines and will address the directives relative to ATC in FERC Orders 890 and 693.

In addition to making all required modifications to MOD-001, MOD-004, and MOD-008, the following standards may be modified, transferred to NAESB, or retired in accordance with stakeholder comments and FERC directives:

- FAC-012 – Transfer Capability Methodology
- FAC-013 – Establish and Communicate Transfer Capabilities
- MOD-002 – Review of TTC and ATC Calculations and Results
- MOD-003 – Procedure for Input on TTC and ATC Methodologies and Values
- MOD-007 – Documentation of the Use of CBM

The requesters would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "ATC Supplement SAR" by **June 24, 2007**.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments:

2. Please provide any other comments you have on the SAR.

Comments:

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

Please use this form to submit comments on the proposed Supplemental SAR for Revisions to MOD-001 through MOD-009; FAC-012 through FAC-013. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "ATC Supplement SAR" in the subject line. If you have questions please contact **Andy Rodriquez** at [Andy.Rodriquez@nerc.net](mailto:Andy.Rodriquez@nerc.net) or by telephone at 609-947-3885.

<b>Individual Commenter Information</b>	
<b>(Complete this page for comments from one organization or individual.)</b>	
Name:	Tom Mielnik
Organization:	MidAmerican Enery Company
Telephone:	563-333-8129
E-mail:	tcmielnik@midamerican.com
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/> 2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/> 3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/> 4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/> 5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/> 6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/> 7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/> 8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/> 9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/> 10 — Regional Reliability Organizations and Regional Entities



## **Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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### **Background Information**

This SAR is intended to supplement the already approved SARs to modify ATC/TTC/AFC and CBM/TRM. The expanded scope will bring the set of standards into compliance with the latest versions of the Reliability Standards Procedure Manual and the ERO's Sanctions Guidelines and will address the directives relative to ATC in FERC Orders 890 and 693.

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- FAC-012 – Transfer Capability Methodology
- FAC-013 – Establish and Communicate Transfer Capabilities
- MOD-002 – Review of TTC and ATC Calculations and Results
- MOD-003 – Procedure for Input on TTC and ATC Methodologies and Values
- MOD-007 – Documentation of the Use of CBM

The requesters would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "ATC Supplement SAR" by **June 24, 2007**.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments:

2. Please provide any other comments you have on the SAR.

Comments: I have no comment except to commend the Standards Drafting Team on doing a good job at developing the supplemental SAR and the revised standards to incorporate the FERC Orders. While I have comments on them, these revised standards as well as the supplemental SAR gets the NERC well on the way to responding to the FERC orders.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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Please use this form to submit comments on the proposed Supplemental SAR for Revisions to MOD-001 through MOD-009; FAC-012 through FAC-013. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "ATC Supplement SAR" in the subject line. If you have questions please contact **Andy Rodriquez** at [Andy.Rodriquez@nerc.net](mailto:Andy.Rodriquez@nerc.net) or by telephone at 609-947-3885.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## **Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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### **Background Information**

This SAR is intended to supplement the already approved SARs to modify ATC/TTC/AFC and CBM/TRM. The expanded scope will bring the set of standards into compliance with the latest versions of the Reliability Standards Procedure Manual and the ERO's Sanctions Guidelines and will address the directives relative to ATC in FERC Orders 890 and 693.

In addition to making all required modifications to MOD-001, MOD-004, and MOD-008, the following standards may be modified, transferred to NAESB, or retired in accordance with stakeholder comments and FERC directives:

- FAC-012 – Transfer Capability Methodology
- FAC-013 – Establish and Communicate Transfer Capabilities
- MOD-002 – Review of TTC and ATC Calculations and Results
- MOD-003 – Procedure for Input on TTC and ATC Methodologies and Values
- MOD-007 – Documentation of the Use of CBM

The requesters would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "ATC Supplement SAR" by **June 24, 2007**.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

---

**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments:

2. Please provide any other comments you have on the SAR.

Comments: The MRO has no comment except to commend the Standards Drafting Team on doing a good job at developing the supplemental SAR and the revised standards to incorporate the FERC Orders. While the MRO has comments on them, these revised standards as well as the supplemental SAR gets the NERC well on the way to responding to the FERC orders.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

Please use this form to submit comments on the proposed Supplemental SAR for Revisions to MOD-001 through MOD-009; FAC-012 through FAC-013. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "ATC Supplement SAR" in the subject line. If you have questions please contact **Andy Rodriquez** at [Andy.Rodriquez@nerc.net](mailto:Andy.Rodriquez@nerc.net) or by telephone at 609-947-3885.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input checked="" type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities



## **Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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### **Background Information**

This SAR is intended to supplement the already approved SARs to modify ATC/TTC/AFC and CBM/TRM. The expanded scope will bring the set of standards into compliance with the latest versions of the Reliability Standards Procedure Manual and the ERO's Sanctions Guidelines and will address the directives relative to ATC in FERC Orders 890 and 693.

In addition to making all required modifications to MOD-001, MOD-004, and MOD-008, the following standards may be modified, transferred to NAESB, or retired in accordance with stakeholder comments and FERC directives:

- FAC-012 – Transfer Capability Methodology
- FAC-013 – Establish and Communicate Transfer Capabilities
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- MOD-003 – Procedure for Input on TTC and ATC Methodologies and Values
- MOD-007 – Documentation of the Use of CBM

The requesters would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "ATC Supplement SAR" by **June 24, 2007**.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

---

**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments: The SAR will address all of the 77 directives from Orders 693 and 890 that are listed in Attachment 1. It is not clear if this list is comprehensive. Does the list include references have already been handled in the MOD standards currently under review, or does the list only included references yet to be addressed?

2. Please provide any other comments you have on the SAR.

Comments: Is it possible that the proposed SAR drafting team will revise the standards MOD-001, MOD-004, MOD-008, MOD-028, MOD-029 and MOD-030 that are currently under review?

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

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Please use this form to submit comments on the proposed Supplemental SAR for Revisions to MOD-001 through MOD-009; FAC-012 through FAC-013. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "ATC Supplement SAR" in the subject line. If you have questions please contact **Andy Rodriquez** at [Andy.Rodriquez@nerc.net](mailto:Andy.Rodriquez@nerc.net) or by telephone at 609-947-3885.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:		
Organization:		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> <b>ERCOT</b>	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> <b>FRCC</b>	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> <b>MRO</b>	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> <b>NPCC</b>	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> <b>RFC</b>	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> <b>SERC</b>	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> <b>SPP</b>	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> <b>WECC</b>	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> <b>NA – Not Applicable</b>	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
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## **Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

---

### **Background Information**

This SAR is intended to supplement the already approved SARs to modify ATC/TTC/AFC and CBM/TRM. The expanded scope will bring the set of standards into compliance with the latest versions of the Reliability Standards Procedure Manual and the ERO's Sanctions Guidelines and will address the directives relative to ATC in FERC Orders 890 and 693.

In addition to making all required modifications to MOD-001, MOD-004, and MOD-008, the following standards may be modified, transferred to NAESB, or retired in accordance with stakeholder comments and FERC directives:

- FAC-012 – Transfer Capability Methodology
- FAC-013 – Establish and Communicate Transfer Capabilities
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The requesters would like to receive industry comments on this SAR. Accordingly, we request that you include your comments on this form and e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "ATC Supplement SAR" by **June 24, 2007**.

**Comment Form — (Supplemental) SAR for Revisions to Standards MOD-001 through MOD-009; FAC-012 through FAC-013**

---

**You do not have to answer all questions.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. NERC must address the directives in FERC Orders 890 and 693. Do you agree that this SAR is comprehensive enough to fully address the directives relative to ATC that are included in these Orders? If not, please explain in the comments area.

Yes

No

Comments:

2. Please provide any other comments you have on the SAR.

Comments:

## Standard Authorization Request Form

### Attachment to the Supplemental SAR

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Title of Proposed Standard Revisions to existing Standards MOD-001 through MOD-009; FAC-012 through FAC-013. (This SAR is intended to supplement the two already approved SARs for "Revision to Existing Standard MOD-001" dated 2/15/2006 and "Revision to Standards MOD-004, MOD-005, MOD-006, MOD-008, MOD-009" )

Request Date May 23, 2007

SAR Requester Information	SAR Type <i>(Check a box for each one that applies.)</i>	
Name The following members of the ATCT Drafting Team:	<input type="checkbox"/>	New Standard
Primary Contact	<input checked="" type="checkbox"/>	Revision to existing Standard
Telephone Fax	<input checked="" type="checkbox"/>	Withdrawal of existing Standard (possible)
E-mail	<input type="checkbox"/>	Urgent Action

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#### Purpose

This SAR is intended to supplement the SAR for "Revision to Existing Standard MOD-001" dated 2/15/2006, in response to FERC Orders 890 and 693. In evaluating the Orders, it has been discovered that additional modifications will be required to ensure clarity and consistency. Specifically, the following Standards may be modified, transferred to NAESB, or retired:

- FAC-012 Transfer Capability Methodology
- FAC-013 Establish and Communicate Transfer Capabilities
- MOD-002 Review of TTC and ATC Calculations and Results
- MOD-003 Procedure for Input on TTC and ATC Methodologies and Values
- MOD-007 Documentation of the Use of CBM

**Industry Need** The FERC has directed NERC to provide these changes and clarifications in support of Preventing Undue Discrimination and Preference in Transmission Service, as well in support of Mandatory Reliability Standards for the Bulk Power System. NERC and the Industry will provide these changes and clarifications in support of Consistent Modeling Methods and Principles for Simulating Power Transfers and Determination of Transfer Capabilities, Timely and Accurate Communication of the Values of the TTC/TFC and the Assumptions Used to Calculate the TTC/TFC, and eliminating a fill-in-the-blank Standards. NERC, as the ERO, is required to comply with all FERC directives.

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**Brief Description** As directed by the FERC, the drafting team is developing proposed requirements to bring greater consistency and transparency to the calculation of TTC/TFC,

ATC/AFC, ETC, CBM, and TRM. The modifications include elimination of the 'fill-in-the-blank' requirements. This possibility was identified in the original SAR; this supplemental SAR is requesting explicit ability to take action on these other standards as a part of the entire standards effort. This will be accomplished by the expansion of the exiting MOD-001 through 009 Standard Drafting Team. The expanded MOD-001 through 009 Standard Drafting Team will be comprised of personnel experienced and qualified in the calculation of the TTC/TFC for the planning and operating horizons and communicating those values and assumptions in a manner that will support the planning and operations of the BES and support efforts to make Available Transfer Capability methods and results transparent to the industry's Transmission Customers.

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**Detailed Description**

Actions of the drafting team may include:

FAC-012 Transfer Capability Methodology,

Modification of FAC-012 or retirement of FAC-012 and movement to a new MOD standard. These standards are not related to Facility Design, Construction, and Maintenance. Rather, they are about the mathematical modeling used to analyze the bulk electric system for the purposes of maintaining reliable planning and operation of the BES and supporting efforts to make Available Transfer Capability methods and results transparent to the industry's Transmission Customers. However, all of the FAC Standards series are relate and the modeling in Standard FAC -012 is directly related to FAC 001 through 011.

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Prepare for approval by the Industry, NERC BOT, and FERC a detailed standard that will provide the necessary requirements for the industry to develop Total Transfer Capabilities or Total Flowgate Capabilities utilizing methods that will meet the following requirements:

- Eliminate the "fill-in-blank" format of FAC-012-1
- The Standard will be written in a detailed format that incorporates the principles of calculating Total Transfer Capabilities or Total Flowgate Capabilities contained in "A Reference Document for Calculating and Reporting the Electric Power Transfer Capability of Interconnected Electric Systems;" dated 1995; Titled Transmission Transfer Capability; published by the North American Electric Reliability Council.
- The Standard will be written to include detailed requirements for eliminating discontinuity at the seams between Regions that utilize different methods of calculating Total Transfer Capability or Total Flowgate Capabilities.
- The Standard will retire the glossary term Transfer Capability and modify, if necessary, the glossary term Total Transfer Capability to be consistent with the principles contained in the this Standard.
- The Standard will insure that the Applicable Reliability Functions calculate the values of the Total Transfer Capabilities or Total Flowgate Capabilities for planning and operating horizons in a timely manner that will support the planning and operations of the BES and support marketing effort to make Available Transfer Capability methods and results transparent to the industry's Transmission Customers.

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FAC-013 Establish and Communicate Transfer Capabilities,

Modification of FAC-013 or retirement of FAC-013 and incorporation into a new MOD standard. These standards are not related to Facility Design, Construction, and Maintenance. Rather, they are about the mathematical modeling used to analyze the bulk electric system for the purposes of maintaining reliable planning and operation of the BES and supporting efforts to make Available Transfer Capability methods and results transparent to the industry's Transmission Customers.

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Deleted: and retirement

Deleted: constructs

Deleted: reliability

Prepare for approval by the Industry, NERC BOT, and FERC a detailed standard that will provide the necessary requirements for the industry to timely communicate the values of the Total Transfer Capability or Total Flowgate Capability calculated in accordance with the requirements of FAC-012; and to communicate, when required by other Standards, the assumptions used to calculate the values of the Total Transfer Capability or Total Flowgate Capability to support reliable operations and the marketing requirements of Available Transfer Capability.

The assumptions used to determine the Total Transfer Capability or Total Flow Capability communicated to the industry shall, without violating confidentiality or security requirements, include, but not be limited to:

- Existing Transmission Commitments Used for Planned Scheduled Energy Transfers
- Projected Loads
- Planned Generator Unit Commitments
- Planned System Configuration of the Interconnected System
- System Contingencies Assumed During the Studies
- Impacts of Neighboring Systems
- Impacts on Neighboring Systems

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MOD-002 Review of TTC and ATC Calculations and Results

Incorporation into MOD-001 and retirement. It is believed that much of this is related to the measurement and compliance aspects of Available Transfer Capability, and will be handled as such.

MOD-003 Procedure for Input on TTC and ATC Methodologies and Values

Transfer to NAESB and retirement. It is believed that this standard is more focused on business practices.

MOD-007 Documentation of the Use of CBM

Incorporation into MOD-004 and retirement. It is believed that much of this is related to the measurement and compliance aspects of CBM, and will be handled as such.

The drafting team will address all of the directives in FERC Order 693 and FERC Order 890 listed in Attachment 1.

**Reliability Functions**

<b>The Standard will Apply to the Following Functions</b> <i>(Check box for each one that applies.)</i>		
<input checked="" type="checkbox"/>	Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.
<input checked="" type="checkbox"/>	Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time.
<input type="checkbox"/>	Interchange Coordinator	Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas.
<input checked="" type="checkbox"/>	Planning Coordinator	Assesses the longer-term reliability of its Planning Coordinator Area.
<input type="checkbox"/>	Resource Planner	Develops a >one year plan for the resource adequacy of its specific loads within a Planning Coordinator area.
<input checked="" type="checkbox"/>	Transmission Planner	Develops a >one year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area.
<input checked="" type="checkbox"/>	Transmission Service Provider	Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff).
<input checked="" type="checkbox"/>	Transmission Owner	Owns and maintains transmission facilities.
<input checked="" type="checkbox"/>	Transmission Operator	Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.
<input type="checkbox"/>	Distribution Provider	Delivers electrical energy to the End-use customer.
<input checked="" type="checkbox"/>	Generator Owner	Owns and maintains generation facilities.
<input type="checkbox"/>	Generator Operator	Operates generation unit(s) to provide real and reactive power.
<input checked="" type="checkbox"/>	Purchasing-Selling Entity	Purchases or sells energy, capacity, and necessary reliability-related services as required.
<input type="checkbox"/>	Market Operator	Interface point for reliability functions with commercial functions.
<input checked="" type="checkbox"/>	Load-Serving Entity	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.

**Standards Authorization Request Form**

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***Reliability and Market Interface Principles***

<b>Applicable Reliability Principles</b> <i>(Check box for all that apply.)</i>	
<input checked="" type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input checked="" type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input checked="" type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.
<b>Does the proposed Standard comply with all of the following Market Interface Principles?</b> <i>(Select 'yes' or 'no' from the drop-down box.)</i>	
1.	A reliability standard shall not give any market participant an unfair competitive advantage. Yes
2.	A reliability standard shall neither mandate nor prohibit any specific market structure. Yes
3.	A reliability standard shall not preclude market solutions to achieving compliance with that standard. Yes
4.	A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes

***Related Standards***

<b>Standard No.</b>	<b>Explanation</b>
None	None

***Related SARs***

<b>SAR ID</b>	<b>Explanation</b>
None	None

***Regional Variances***

<b>Region</b>	<b>Explanation</b>
ERCOT	None
FRCC	None
MRO	None
NPCC	None
SERC	None
RFC	None
SPP	None
WECC	None

**Directives from Order 693 and 890 related to ATC Standards**

**693-782 Directs the ERO to modify FAC-012 to calculate transfer capability for ATC calculations and eliminate fill-in-the-blank format.**

**693-783 Recognized that the change for FAC-012 is on the schedule set in Order 890**

**693-1050 TTC be addressed under the Reliability Standard that deals with transfer capability such as FAC-012-1, rather than MOD-001-0.**

**693-1051 The Commission directs the ERO, through the Reliability Standards development process, to modify FAC-012-1 and any other appropriate Reliability Standards to assure consistency in the determination of TTC/TFC for services provided under the pro forma OATT,**

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693-1057 Develop non-fill-in-the-blank Standard

693-1057 Define information to be shared between TSPs for ATC calculations

693-1057 Planning Assumptions and ATC Assumptions should be the same

890-292 Planning Assumptions and ATC Assumptions should be the same

890-292 Load levels the same plan/ops vs. ATC

890-292 Gen Dispatch the same plan/ops vs. ATC

890-292 TX and Gen Facilities maintenance the same plan/ops vs. ATC

890-292 Contingency outages the same plan/ops vs. ATC

890-292 Topology the same plan/ops vs. ATC

890-292 TX Reservations the same plan/ops vs. ATC

890-292 Assumptions re: additions and retirements the same plan/ops vs. ATC

890-292 Counterflows the same plan/ops vs. ATC

890-295 Load level modeling methodology the same

890-296 Dispatch should include all DNRs and committed resources as expected to run, and uncommitted resources deliverable within CA, economically dispatched to meet balancing needs

890-297 How to model POR to POD without source/sink

890-297 How to model existing reservations

693-1057 ATC should be updated on a consistent schedule

693-1057 ATC/TTC Assumptions and Contingencies must be made available

693-1057 Put TTC in FAC section

693-1057 Identify applicable entities

693-1105 CBM must be 0 in non-firm ATC

890-262 CBM =0 in Non-Firm Calc

890-273 TRM <> =0 in Non-Firm Calc

890-211 Standard AFC->ATC Calculation

890-212 Firm ATC uses only Firm Commitments

890-212 Non-Firm ATC uses firm and non-firm commitments, postbacks or redirected services, unscheduled service, and counterflows

890-237 Address differences between Pro-Forma TTC and Native Load/Reliability Assessment TTC

890-243 Standard calc of native load use - include in MOD-001

890-244 ETC = Native load (including Network)

890-244 ETC = Grandfathered

890-244 ETC = Appropriate PTP

890-244 ETC = Long-term Rollover rights

890-244 Define any additional ETC components

890-245 Reservations with Same POR whose SUM would exceed gen nameplate must be addressed

890-310 Mandatory Data Exchange for ATC

890-310 DEX Load

890-310 DEX TX Plan and Contingency outages

890-310 DEX Gen Plan and Contingency outages

**Standards Authorization Request Form**

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890-310 DEX Base dispatch

890-310 DEX existing reservations incl counterflows

890-310 DEX ATC recalc frequencies and times

890-310 DEX Source sink modeling identification

890=389 Unscheduled Reservation released on non-firm and posted on OASIS

**Directives from Order 693 and 890 related to CBM Standard**

693-1082 CBM set aside at verified request of LSE  
693-1082 Require disclosure of CBM studies  
693-1082 Define flowgate/path allocation process for CBM  
693-1082 No double counting  
693-1082 Add LSE, BA as applicable entity where necessary  
693-1105 CBM Must be used only for generation deficiencies  
693-1105 Generation Deficiency must be states as an EEA level  
890-260 Define flowgate/path allocation process for CBM  
890-262 CBM Must be used only for generation deficiencies  
890-358 yearly CBM studies  
693-1081 What to do if CBM exceeds ATC?

**Directives from Order 693 and 890 related to TRM Standard**

693-1122 Define flowgate/path allocation process for TRM  
693-1126 Explicit definition of what goes into TRM  
693-1122 TRM = Load Forecast and Load Distribution Error  
693-1122 TRM = Variation in facility loading  
693-1122 TRM = uncertainty in transmission topology  
693-1122 TRM = loop flow  
693-1122 TRM = variations in dispatch  
693-1122 TRM = ARS  
693-1122 Define any additional uses  
890-273 Explicit definition of what goes into TRM  
890-273 TRM = Load Forecast and Load Distribution Error  
890-273 TRM = Variation in facility loading  
890-273 TRM = uncertainty in tx topology  
890-273 TRM = loop flow  
890-273 TRM = variations in dispatch  
890-273 TRM = ARS  
890-273 Define any additional uses  
693-1082 No double counting  
890-273 No double counting  
693-1126 Max TRM Calc  
890-275 Max TRM Calc  
693-1126 Standard on How TRM to be calculated  
693-1126 Add PC, RE to applicable entities