Comments received on initial ballot of MOD-004-1 – Capacity Benefit Margin (Project 2006-07: ATC/TTC/AFC and CBM/TRM Revisions)

Entity	Segment	Vote	Comment
Ameren Services Company	1	Negative	1. The standard as written is more appropriate for NAESB in that it addresses market issues related to ATC/AFC (R1.2 & R5). 2. Similarly the use of CBM is related to the access to short term transmission service (R1.3). 3. The requirements provide for a review of CBM as transmission capacity is available but does not address how or if mitigation is required to restore CBM (R1.1). 4. Methodologies described in R3.1 are not definitive. LOLE and LOLP are a function of reserve margins and CBM so how can an entity use one or the other to define CBM. The same LOLE can be the result of an 80% reserve margin and large CBM or a 130% reserve margin and 0 CBM. 5. R3.2 allows the LSE to arbitrarily pick paths and sources to make up CBM. Without contractual obligations for explicit capacity or participation in some form or reserve sharing group there is no foundation for this selection. The impact of changing paths and sources if the LSE/BA changes their selection would lead to inconsistent ATC/AFC values. 6. Same comments with respect to R4. 7. How does the TSP maintain CBM? In the short term CBM can be included in the ATC/AFC calculation to avoid over subscription but how does the TSP assure that CBM is maintained in granting long term transmission service? 8.What obligation does the TSP have to maintain CBM if the LSE, BA, or RP performs studies in which large values of CBM are used to minimize capacity reserve requirements? 9. What obligation does the TSP have to allocate CBM to the paths or flowgates designated by the LSE, RP, or BA? These could be market participants who could game the market by their unilateral selection of paths or flowgates. 10. What is the impact of R6? Does the TP, in including the unilateral and arbitrary CBM allocations, need to mitigate any resulting transmission deficiencies? 11. How does CBM affect TPL standards compliance for the TP? Since CBM is the access to undesignated resources over unreserved transmission service how should it be treated in long term planning? 12. What doe LSE, RP, and BA do if under R7 the TSP informs them that the CBM they needed to meet their LOLE, LOLP, or reserve margins is not available in the amounts they assumed? 13. The same applies to R8 if the TP indicates that there is insufficient transmission capacity in the future to support the amount of CBM assumed/required. 14. Requirements R10, R11, R12 are all related to transmission service and OATT and are more appropriate in NAESB.
Duke Energy Carolina	1	Affirmative	1. In R5.2, second bullet, can an adequate flowgate analysis be performed if only the expected import path is provided (i.e., no source region is provided)? Same for R6.2 2. For clarification, R11 should be modified to say that: ALL BAs and TSPs shall waive, within the bounds of reliable operation, any Real-time timing and ramping requirements. 3. R3.1 and R4.1 " the word "studies" in the first three bullets should be changed to "study", to reflect that multiple studies aren't required. Also, in the fourth bullet, the phrase "other entities" should be changed to "an other entity" to reflect that reserve margin or resource adequacy requirements may only be established by one other entity. 4. R3.2 and R4.2 " the word "paths" should be changed to "path(s)" and the word

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			"regions" should be changed to "region(s)", to reflect that there may be only one import path or region. 5. M10 should be revised as follows: "Each Load-Serving Entity and Balancing Authority shall provide evidence (such as logs, copies of tag data, or other data from its Reliability Coordinator) that at the time it requested to import energy using firm Transfer Capability set aside as CBM, IT WAS in an EEA 2 or higher."
Exelon Energy	1	Affirmative	General comment This standard brings the industry closer to a unified CBM calculation methodology by requiring that one of four calculation methodologies be utilized and documented. This is an improvement from where the industry is today but falls short of what the FERC desired. The standard still requires improvement in several areas. Suggested modifications to the standard to achieve these improvements are included in our comments. Requirements R3 and R4 R3 and R4 need to be reworded to make clear that the Load-Serving Entity or Resource Planner determine the "amount" of Generation Capability Import Requirement (GCIR) not the "need' for GCIR. In addition, the Planning Authority also needs to be included because some Load-Serving Entities may not have the experience or data to perform the required studies. These studies require knowledge of generator availabilities, aggregated coincitized loads, transmission expansion and outage rate data, etc. The following wording changes are recommended: R3. Each Load-Serving Entity or Planning Authority determining the need for Transmission capacity to be set aside as CBM for imports into a Balancing Authority Area shall determine the amount of GCIR needed by: R4. Each Resource Planner determining the need for Transmission capacity to be set aside as CBM for imports into a Balancing Authority Area shall determine the amount of GCIR needed by: R3.1 and R4.1 Fourth Bullet: The amount of Generation Capability Import Requirement (GCIR) required, cannot be based on reserve margin or resource adequacy requirements. This requirement is inconsistent with the "Transmission Capability Margins and Their Use In ATC Determination " White Paper" which states on page 9, "The planned purchase of energy to serve network load (including native load) and/or meet required/recommended generation reserve levels are not to be included in the CBM quantity". The reserve margin or resource adequacy requirements may be inputs or considerations in the determination of GCIR but not the direct basis for the determination. Bullet 4 in R3.1 and R 4.1 needs to be completely removed. Requirement R6 In R6, the transmission planner should not be required to use flowgates or be determining CBM values for them. The transmission planning process is typically a more rigorous study process than used in ATC calculations. This is discussed on page 10 of the "Transmission Capability Margins and Their Use In ATC Determination " White Paper" which states "The methodology used to derive CBM must be documented and consistent with published planning criteria. A CBM is considered consistent with published planning criteria if the same components that comprise the CBM are also addressed in the planning criteria. The methodology used to determine and apply CBM does not have to involve the same mechanics as the planning process, but the same uncertainties must be considered and any simplifying assumptions explained. It is recognized that ATC determinations are often time constrained and thus will not

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			permit the use of the same mechanics employed in the more rigorous planning process". The following wording changes are recommended for R6: At least every 13 months, the Transmission Planner shall either establish a CBM value for each ATC Path or Flowgate or incorporate into the planning process the GCIR amounts determined in R3 or R4. Either of these values is to be used in planning during each of the years two through ten following the current year. This value shall: R6.1. Be based upon : Â· Any studies (as described in R3.1) performed by Load-Serving Entities or Planning Authorities for loads within the Transmission Service Provider's area Â· Any studies (as described in R4.1) performed by Resource Planners for loads within the Transmission Service Provider's area Requirement R5, R7 and R8 R7 and R8 do not appear to align. In R7, the Transmission Service Provider notifies the LSEs and Resource Planners of the "amount of CBM set aside to meet their need", while in R8, the Transmission Planner notifies the same entities of the "amount of CBM set aside to meet their need". Yet, there is no requirement that the two CBM values be based on the same criteria. R5 and R6.1 only require the TSP and Transmission Planner to "reflect consideration of the studies conducted by Load-Serving Entities and Resource Planners. These two requirements need to be revised to have the Transmission Service Provider and Transmission Planner base their CBM related studies on the CIGR values provided by the Load-Serving Entities and Resource Planners. Only the Transmission Service Provider needs to inform the Load-Serving Entities and Resource Planners of the CBM values while the Transmission Planner only needs to inform them that the GCIR values have been incorporated into the Planning process. The following wording changes are recommended: R5.1. Be based upon : Â· Any studies (as described in R3.1) performed by Load-Serving Entities or Planning Authorities for loads within the Transmission Service Provider's area Â· Any studies (as described in R4.1) performed by Resource Planners for loads within the Transmission Service Provider's area R7. Less than 31 calendar days after the establishment of CBM, the Transmission Service Provider that maintains CBM shall notify all the Load-Serving Entities, Planning Authorities and Resource Planners that determined they had a need for CBM on the Transmission Service Provider's system of the amount of CBM set aside. R8. Less than 31 calendar days after the establishment of CBM, the Transmission Planner shall notify all the Load-Serving Entities, Planning Authorities and Resource Planners that determined they had a need for CBM on the system being planned by the Transmission Planner of the amount of CBM set aside or that the GCIR values provided, have been incorporated into the planning process.
FirstEnergy Energy Delivery	1	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed MOD-004 standard within the Midwest ISO, FE is voting NEGATIVE to the standard as written. FE believes a standard should not be written in a way that would knowingly require delegation or JRO agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and their respective member companies to complete a regional variance for the MISO regional transmission organization and

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			include it within the standard as a Regional Difference. A variance is needed to explain the MOD-004 requirements that describe tasks which have been transferred by the MISO member transmission companies to MISO. As discussed in our comments, the requirements that need a variance are R3, R4, R6, R8, and R9. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. In the MISO market, MISO, through Module E of its tariff, conducts Resource Adequacy studies to determine if sufficient generation resources are available to serve load within its footprint. Also, MISO establishes CBM values for flowgates based on the remaining power requirement for short term (less than a year) ATC calculations and establishes a predetermined CBM value for each ATC Path or Flowgate or GCIR for each designated area to be used for future transmission planning during the subsequent years two through ten. Both of these processes (Resource Adequacy and CBM Methodology) have been through a stakeholder process and MISO's member companies have agreed to abide by these rules. Requirements R3 and R4 state that the Load Serving Entity (LSE) and Resource Planner (RP) "determining the need for Transmission capacity to be set aside as CBM :shall determine that need by:" As written, it is FE's understanding that the standard does not explicitly require an LSE or RP to perform a study and justify whether or not CBM is needed and that the intent is if a LSE or RP has elected to request CBM then the study shall be based on the sub-requirements of R3 and R4. In requirement R6 the Time Horizon should reflect Long-term Planning. Also, the statement in R6 "to be used in planning" is assumed to imply only planning for reviewing the adequacy of CBM values within the realm of resource planning and are no way meant to be tied to the TPL planning standards.
Hydro One Networks, Inc.	1	Negative	Hydro One Networks Inc. casts a Negative vote with the following comments: Requirements R5 and R6 address the establishment for a CBM value : at least every 13 months following the current month. The language is not clear as the "current month" needs to be defined for the proposed change to make sense. The language was better in the previous version. In general, the revisions are not explicit enough and could lead to misinterpretations that are not within the intent of the Standard.
Hydro-Quebec TransEnergie	1	Negative	In R5 and R6 respectively, the terms "current month" and "current year" are not clear when put in the context of this Standard; they should be change for "the month (or year) when it is calculated" or the original wording should be restored. In R12, if the new concept of "Energy Deficient Entity" is to be used, it needs to be defined in the Glossary.
National Grid	1	Negative	National Grid agrees with the recommendations by NPCC and its members by recommending a negative vote to the changes made to MOD-004. These latest changes are not explicit enough and could lead to misinterpretations, modifying the intention of the standard. Specifically, in requirement R5, the revision to "subsequent 13 months" is not clear. The "current month" needs to be defined for the change to make sense. A suggestion is to have the revisions to R5 rescinded and the original

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			wording restored. Similarly, in requirement R6, the revision to "subsequent years..." is not clear. The "current year" needs to be defined for the change to make sense. A suggestion is to have the revisions to R6 rescinded and the original wording restored. In requirement R12, "Energy Deficient Entity" needs to be defined in the Glossary.
New York Power Authority	1	Negative	These latest revisions are not explicit enough, and could lead to misinterpretations, modifying the intention of the standard.
Northeast Utilities	1	Negative	R5 - The revision to "subsequent 13 months" is not clear. The "current month" needs to be defined for the change to make sense. A suggestion is to have the revisions to R5 rescinded and the original wording restored. R6 - The revision to "subsequent years..." is not clear. The "current year" needs to be defined for the change to make sense. A suggestion is to have the revisions to R6 rescinded and the original wording restored. R12 - "Energy Deficient Entity" needs to be defined in the Glossary. These latest revisions are not explicit enough, and could lead to misinterpretations, modifying the intention of the standard.
Southwest Transmission Cooperative, Inc.	1	Abstain	SWTC is abstaining. SWTC does not use CBM at this time.
Consolidated Edison Co. of New York	3	Negative	These latest revisions are not explicit enough, and could lead to misinterpretations, modifying the intention of the standard. The term "Energy Deficient Entity" needs to be defined in the Glossary. Requirement R5: The revision to "subsequent 13 months" is not clear. The "current month" needs to be defined for the change to make sense. A suggestion is to have the revisions to R5 rescinded and the original wording restored. Requirement R6: The revision to "subsequent years..." is not clear. The "current year" needs to be defined for the change to make sense. A suggestion is to have the revisions to R6 rescinded and the original wording restored.
Consumers Energy	3	Affirmative	We believe there is a typo in the last parenthetical of R6, which should read: R6. ... This value shall: [Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]
FirstEnergy Solutions	3	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed MOD-004 standard within the Midwest ISO, FE is voting NEGATIVE to the standard as written. FE believes a standard should not be written in a way that would knowingly require delegation or JRO agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and their respective member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-004 requirements that describe tasks which have been transferred by the MISO member transmission companies to MISO. As discussed in our comments, the requirements that need a variance are R3,

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			R4, R6, R8, and R9. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. In the MISO market, MISO, through Module E of its tariff, conducts Resource Adequacy studies to determine if sufficient generation resources are available to serve load within its footprint. Also, MISO establishes CBM values for flowgates based on the remaining power requirement for short term (less than a year) ATC calculations and establishes a predetermined CBM value for each ATC Path or Flowgate or GCIR for each designated area to be used for future transmission planning during the subsequent years two through ten. Both of these processes (Resource Adequacy and CBM Methodology) have been through a stakeholder process and MISO's member companies have agreed to abide by these rules. Requirements R3 and R4 state that the Load Serving Entity (LSE) and Resource Planner (RP) "determining the need for Transmission capacity to be set aside as CBM :shall determine that need by:" As written, it is FE's understanding that the standard does not explicitly require an LSE or RP to perform a study and justify whether or not CBM is needed and that the intent is if a LSE or RP has elected to request CBM then the study shall be based on the sub-requirements of R3 and R4. In requirement R6 the Time Horizon should reflect Long-term Planning. Also, the statement in R6 "to be used in planning" is assumed to imply only planning for reviewing the adequacy of CBM values within the realm of resource planning and are no way meant to be tied to the TPL planning standards.
Hydro One Networks, Inc.	3	Negative	Hydro One Networks Inc. casts a Negative vote with the following comments: Requirements R5 and R6 address the establishment for a CBM value : at least every 13 months following the current month. The language is not clear as the "current month" needs to be defined for the proposed change to make sense. The language was better in the previous version. In general, the revisions are not explicit enough and could lead to misinterpretations that are not within the intent of the Standard.
Lincoln Electric System	3	Negative	MOD-004 R6 appears to be missing an important disclaimer present on most other requirements such as "that maintains CBM" which allows entities to forego the requirement when they don't use CBM. An entity that does not use CBM should not be required to perform analyses or develop studies on CBM at least every 13 months.
Niagara Mohawk (National Grid Company)	3	Negative	These latest revisions are not explicit enough, and could lead to misinterpretations, modifying the intention of the standard. See below. R5 & R6: The revision to "subsequent 13 months" is not clear. The "current month" needs to be defined for the change to make sense. A suggestion is to have the revisions to R5 rescinded and the original wording restored. R12: "Energy Deficient Entity" needs to be defined in the Glossary.
Consumers Energy	4	Affirmative	"We believe there is a typo in the last parenthetical of R6, which should read: R6. ... This value shall: [Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]"
Integrys	4	Negative	Requirements R3 and R4 need to provide for groups of LSEs that form Planning Reserve Sharing

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Energy Group, Inc.			Groups (PRSGs) that desire a single CBM for imports into a particular zone that may or may not be a single BAA. The existing language in R3 and R4 limits CBM to a single LSE/Resource Planning and a single BAA. R3 and R4 must be flexible enough to provide for groups of LSEs that identify a single CBM value into a defined region or zone (for example, 5 LSEs within a defined import constrained zone). Requirements R3 and R4 must also reflect the emergency nature of CBM that is contained in R10. Suggested R3 and R4 language for consideration: Each Load-Serving Entity or groups of Load-Serving Entities determining the need for Transmission capacity to be set aside as CBM for emergency imports into a Balancing Authority Area or other defined CBM region shall determine that need by:
Ohio Edison Company	4	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed MOD-004 standard within the Midwest ISO, FE is voting NEGATIVE to the standard as written. FE believes a standard should not be written in a way that would knowingly require delegation or JRO agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and their respective member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-004 requirements that describe tasks which have been transferred by the MISO member transmission companies to MISO. As discussed in our comments, the requirements that need a variance are R3, R4, R6, R8, and R9. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. In the MISO market, MISO, through Module E of its tariff, conducts Resource Adequacy studies to determine if sufficient generation resources are available to serve load within its footprint. Also, MISO establishes CBM values for flowgates based on the remaining power requirement for short term (less than a year) ATC calculations and establishes a predetermined CBM value for each ATC Path or Flowgate or GCIR for each designated area to be used for future transmission planning during the subsequent years two through ten. Both of these processes (Resource Adequacy and CBM Methodology) have been through a stakeholder process and MISO's member companies have agreed to abide by these rules. Requirements R3 and R4 state that the Load Serving Entity (LSE) and Resource Planner (RP) "determining the need for Transmission capacity to be set aside as CBM :shall determine that need by:" As written, it is FE's understanding that the standard does not explicitly require an LSE or RP to perform a study and justify whether or not CBM is needed and that the intent is if a LSE or RP has elected to request CBM then the study shall be based on the sub-requirements of R3 and R4. In requirement R6 the Time Horizon should reflect Long-term Planning. Also, the statement in R6 "to be used in planning" is assumed to imply only planning for reviewing the adequacy of CBM values within the realm of

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			resource planning and are no way meant to be tied to the TPL planning standards.
FirstEnergy Solutions	5	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed MOD-004 standard within the Midwest ISO, FE is voting NEGATIVE to the standard as written. FE believes a standard should not be written in a way that would knowingly require delegation or JRO agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and their respective member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-004 requirements that describe tasks which have been transferred by the MISO member transmission companies to MISO. As discussed in our comments, the requirements that need a variance are R3, R4, R6, R8, and R9. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. In the MISO market, MISO, through Module E of its tariff, conducts Resource Adequacy studies to determine if sufficient generation resources are available to serve load within its footprint. Also, MISO establishes CBM values for flowgates based on the remaining power requirement for short term (less than a year) ATC calculations and establishes a predetermined CBM value for each ATC Path or Flowgate or GCIR for each designated area to be used for future transmission planning during the subsequent years two through ten. Both of these processes (Resource Adequacy and CBM Methodology) have been through a stakeholder process and MISO's member companies have agreed to abide by these rules. Requirements R3 and R4 state that the Load Serving Entity (LSE) and Resource Planner (RP) "determining the need for Transmission capacity to be set aside as CBM :shall determine that need by:" As written, it is FE's understanding that the standard does not explicitly require an LSE or RP to perform a study and justify whether or not CBM is needed and that the intent is if a LSE or RP has elected to request CBM then the study shall be based on the sub-requirements of R3 and R4. In requirement R6 the Time Horizon should reflect Long-term Planning. Also, the statement in R6 "to be used in planning" is assumed to imply only planning for reviewing the adequacy of CBM values within the realm of resource planning and are no way meant to be tied to the TPL planning standards.
Barry Green Consulting Inc.	6	Negative	In the current draft of MOD-004 that is subject to balloting, I have the following two concerns: * The update frequency for specifying the quantities of CBM to be withheld should be specified and should be at least quarterly. Less frequent updates may mean either that insufficient CBM is being withheld for emergency purposes or an excessive amount of ATC is being withheld from the market unnecessarily. * R3.1 specifies certain types of studies that are appropriate for the determination of CBM to be requested, for example LOLP studies. However, no guidance is provided on the appropriate target reliability. For example is 1 day in 10 years appropriate or 1 day in 100 years?

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Consolidated Edison Co. of New York	6	Negative	The latest revisions are not explicit enough, and could lead to misinterpretations, modifying the intention of the standard. Requirement 5: The revision to "subsequent 13 months" is not clear. The "current month" needs to be defined for the change to make sense. A suggestion is to have the revisions to R5 rescinded and the original wording restored. Requirement 6: The revision to "subsequent years..." is not clear. The "current year" needs to be defined for the change to make sense. A suggestion is to have the revisions to R6 rescinded and the original wording restored. Requirement 12: "Energy Deficient Entity" needs to be defined in the Glossary.
FirstEnergy Solutions	6	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed MOD-004 standard within the Midwest ISO, FE is voting NEGATIVE to the standard as written. FE believes a standard should not be written in a way that would knowingly require delegation or JRO agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and their respective member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-004 requirements that describe tasks which have been transferred by the MISO member transmission companies to MISO. As discussed in our comments, the requirements that need a variance are R3, R4, R6, R8, and R9. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. In the MISO market, MISO, through Module E of its tariff, conducts Resource Adequacy studies to determine if sufficient generation resources are available to serve load within its footprint. Also, MISO establishes CBM values for flowgates based on the remaining power requirement for short term (less than a year) ATC calculations and establishes a predetermined CBM value for each ATC Path or Flowgate or GCIR for each designated area to be used for future transmission planning during the subsequent years two through ten. Both of these processes (Resource Adequacy and CBM Methodology) have been through a stakeholder process and MISO's member companies have agreed to abide by these rules. Requirements R3 and R4 state that the Load Serving Entity (LSE) and Resource Planner (RP) "determining the need for Transmission capacity to be set aside as CBM :shall determine that need by:" As written, it is FE's understanding that the standard does not explicitly require an LSE or RP to perform a study and justify whether or not CBM is needed and that the intent is if a LSE or RP has elected to request CBM then the study shall be based on the sub-requirements of R3 and R4. In requirement R6 the Time Horizon should reflect Long-term Planning. Also, the statement in R6 "to be used in planning" is assumed to imply only planning for reviewing the adequacy of CBM values within the realm of resource planning and are no way meant to be tied to the TPL planning standards.
Lincoln Electric	6	Negative	MOD-004 R6 appears to be missing an important disclaimer present on most of the other

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System			requirements such as "that maintains CBM" which allows entities to forego the requirement when they don't use CBM. An entity that does not use CBM should not be required to perform analyses or develop studies on CBM at least every 13 months.
MidAmerican Energy Co.	6	Negative	Absolutely no standardization in the industry due to this "standard". Might create some additional transparency in the industry but this standard clearly does not define how the CBM value shall be determined and allocated across transmission paths. It is generic in nature and fill-in-the-blank. I am sure one could argue FERC orders don't require that everyone use a similar methodology, but MidAmerican would like that to be the case.
JDRJC Associates	8	Negative	The VSLs need further work. Too many have four levels and the graduation between levels don't amke sense from arelaibility impacr prespective.
Midwest Reliability Organization	10	Negative	MOD-004 R6 appears to be missing an important disclaimer present on most other requirements such as "that maintains CBM" which allows entities to forego the expense when they don't use CBM. An entity that does not use CBM should not be required to perform analyses or develop studies on CBM at least every 13 months.