Entity	Segment	Vote	Comment
Ameren Services Company	1	Negative	Ameren would like to thank the SDT for the considerable effort invested in drafting this standard. However, Ameren cannot support this version of MOD-008-1. (1) Applicability: The Transmission Service Provider not the Transmission Operator should be responsible for TRM methodology. This is especially true when the Transmission Service Provider determines TRM for the transmission systems of several Transmission Operators as would occur in an RTO/ISO such as the MISO. (2) Is TRM a reliability parameter or a market parameter? While the concepts of uncertainty and sensitivity analysis are inherent in reliability planning TRM as a metric has not been previously defined in the planning process. TRM has been applied in sale of open access transmission system to limit exposure to oversubscription of transmission service. As such TRM should be the responsibility of the Transmission Service Provider. (3) That said we are aware that the oversubscription of transmission service can lead to reliability problems. (4) The Transmission Service Provider, Transmission Operator, Planning Coordinator, and Transmission Planner should coordinate and cooperate in developing the TRM methodology. (5)TRM is applicable in the Operating Time Horizon and the one-year and beyond horizon.
American Electric Power	1	Affirmative	AEP votes affirmative, but we have a concern that the standard appears to have an internal ambiguity. The applicability states “Transmission Operators that maintain TRM" however, R1 requires that “Each Transmission Operator shall prepare and keep current a TRM Implementation Document (TRMID) ...." In the context of R1, it unclear what requirements are placed upon Transmission Operators that DOES NOT maintain TRM. In addition, the Purpose statement implies that TRM is used as a real-time operation value. It is not. Despite these reservations, the proposed standard is benign, and AEP does vote affirmative.
Brazos Electric Power Cooperative, Inc.	1	Negative	A NEGATIVE vote is cast for this standard as written as it imposes obligations on entities in the ERCOT region that do not utilize ATC paths and calculation methodologies to manage congestion or for reliability operations. Our previous submitted comments suggested that applicability language be included in the requirements to recognize that such market difference exists.
Exelon Energy	1	Affirmative	General comment These standards bring the industry closer to a unified ATC calculation methodology by requiring that one of three calculation methodologies be utilized and documented. This is an improvement from where the industry is today but falls short of FERC Order No. 890. The standards still lack a requirement for ATC or AFC calculations to be consistent with criteria used in operating and planning studies for corresponding time periods. Exelon's comments reflect these deficiencies and Exelon will be making these same points to FERC if these standards are approved, requesting that the FERC direct NERC to approve the standards but modify the standards to be consistent with Order No. 890. Suggested modifications to the standards to achieve this consistency are included in our comments. MOD-008-1 TRM Calculation Methodology Standard lacks a requirement that components of TRM be consistent with those used in operating and planning studies for the same time period being studied
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-008 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity

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			classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation 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 its 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-008 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and Attachment C of the MISO Open Access Transmission and Energy Market Tariff. 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. As described in the procedure, "Variances should be identified and considered when a SAR is posted for comment. Variances should also be considered in the drafting of a standard, with the intent to make any necessary variances a part of the initial development of a standard. The public posting allows for all impacted parties to identify the requirements of a NERC reliability standard that might require a variance." FE believes it is important to complete and include the MISO variance in conjunction with the drafting of the MOD-008 standard. FE requests the variance to cover TOP tasks as described in the following requirements: - All Requirements (R1 through R5) Additional Comments: Applicability Section - The applicability states "Transmission Operators that maintain TRM" and all requirements of the standard are applicable to the TOP in regards to preparing and maintaining a TRM Implementation Document (TRMID), distributing the TRMID to other interested parties, calculating TRM consistent with the TRMID, etc. It is unclear to FE what requirements are placed upon a Transmission Operator that DOES NOT maintain TRM. A TOP who does not maintain TRM could be interpreted one of two ways: 1) For a given TOP footprint TRM is not withheld in calculating ATC 2) TRM is withheld for the TOP footprint, but the TOP does not determine or calculate the TRM value withheld. If the appropriate interpretation is as described in item 1) above, it begs the question if this is a needed reliability standard. If TRM is truly a reliability need, it can not be optional for any TOP service area. If the latter, item 2 and FE's understanding, is the correct interpretation, then FE's position on responsibility remains that that the applicability of this standard should rest with the entity performing the calculation of TRM which in many areas of the country is the TSP organization. Since the SDT has elected to not make a change in this regard we are requesting the aforementioned variance for the MISO RTO area.
Great River Energy	1	Negative	GRE is concerned with the Transmission Operator being the responsible entity for MOD-008. GRE believes that the responsible entity for these requirements should be the Transmission Service Provider. If the Transmission Operator does not perform this function then a delegation agreement must be created between it and the entity performing the function. It is GRE's opinion that a standard should not knowingly be written in a manner that requires delegation agreements for a large number of responsible entities, doing so is an inefficient use of resources.
Sierra Pacific Power Co.	1	Affirmative	Affirmative vote with comment: The severity levels surrounding R1 still appear to imply that all of the sub-items of R1.1 are expected to be used in the TRMID. It must be clear that it does not constitute a violation if

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			various of these sub-items are not applicable to the TRMID used by the entity. Clarify that this is "as applicable" or "as determined by the entity".
Southwest Transmission Cooperative, Inc.	1	Affirmative	SWTC supports all elements of MOD-08; however, the VSLs as redrafted to accommodate the industry comments have blurred the lines of severity and grant additional discretion to the enforcement entity. Further, the Applicable entity should be clarified throughout the standard to clearly identify whether the standard applies only to TOs that maintain TRM or to all TOs.
Tucson Electric Power Co.	1	Affirmative	TEP supports proposed WECC Team remedial language clarifying VSL severity level.
Ameren Services Company	3	Negative	Ameren would like to thank the SDT for the considerable effort invested in drafting this standard. However, Ameren cannot support this version of MOD-008-1. Applicability: The Transmission Service Provider not the Transmission Operator should be responsible for TRM methodology. This is especially true when the Transmission Service Provider determines TRM for the transmission systems of several Transmission Operators as would occur in an RTO/ISO such as the MISO. Is TRM a reliability parameter or a market parameter? While the concepts of uncertainty and sensitivity analysis are inherent in reliability planning TRM as a metric has not been previously defined in the planning process. TRM has been applied in sale of open access transmission system to limit exposure to oversubscription of transmission service. As such TRM should be the responsibility of the Transmission Service Provider. That said we are aware that the oversubscription of transmission service can lead to reliability problems. The Transmission Service Provider, Transmission Operator, Planning Coordinator, and Transmission Planner should coordinate and cooperate in developing the TRM methodology. TRM is applicable in the Operating Time Horizon and the one-year and beyond horizon
City Public Service of San Antonio	3	Negative	I cannot vote for this standard as written. It needs to acknowledge definitive alternatives to ATC for regions or markets such as ERCOT where transmission service markets are not used.
Constellation Energy	3	Affirmative	Greater standardization in the determination of TRM and monitoring of the on-going appropriateness of the amount set aside for TRM is required.
FirstEnergy Solutions	3	Affirmative	FirstEnergy Corp. appreciates the hard work of the Standard Drafting Team on the challenging task of reorganizing and enhancing the verbiage of the IROL requirements. We vote AFFIRMATIVE to standard IRO-008-1 and ask that the SDT consider our enclosed comments. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General “The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows “R7” instead of “R1” IRO-005 - Several Measures reference the incorrect requirement numbers TOP-003 - R4 — There is no measure associated with this requirement - Measures do not include evidence of “planning” of scheduled outages per the requirements - VSL for R3 and R4 are incorrect and reference the wrong entity per the requirements
Lincoln Electric System	3	Negative	LES is concerned with the Transmission Operator being the responsible entity for MOD-008. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
Wisconsin Public Service Corp.	3	Negative	The Transmission Service Provider should be the responsible entity for MOD-008, not the Transmission Operator.
Alliant Energy Corp. Services,	4	Negative	We believe the Transmission Service Provider should be the responsible entity.

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Inc.			
Public Utility District No. 1 of Douglas County	4	Negative	We have not had sufficient time to review the effects of this change and coordinate it with others in our region.
WPS Resources Corp.	4	Negative	Requirement R3. The TRMID document should be made available to all users, owners, and operators. That is, the TRMID should be publicly available.
Constellation Generation Group	5	Negative	Greater standardization in the determination of TRM and monitoring of the on-going appropriateness of the amount set aside for TRM is required then this standard provides. TRM seems to be applied only at certain times by certain TPs. For example, one large TP in the South applies TRM only when an entity is looking for long term transmission service outside an 18 month window. That is, if the transmission service is for a year but the year begins and ends within the next 18 months, TRM isn't applied. This causes a very significant difference in study results. Others apply it differently. This type of item should be standardized.
Electric Power Supply Association	5	Negative	Greater standardization is required with the standard as drafted. Determination of TRM and monitoring of the associated with the ongoing appropriateness of the amounts set aside for TRM is required to achieve the needed standardization.
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-008 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation 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 its 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-008 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and Attachment C of the MISO Open Access Transmission and Energy Market Tariff. 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. As described in the procedure, "Variances should be identified and considered when a SAR is posted for comment. Variances should also be considered in the drafting of a standard, with the intent to make any necessary variances a part of the initial development of a standard. The public posting allows for all impacted parties to identify the requirements of a NERC reliability standard that might require a variance." FE believes it is important to complete and include the MISO variance in conjunction with the drafting of the MOD-008 standard. FE requests the variance to cover TOP tasks as described in the following requirements: - All Requirements (R1 through R5) Additional Comments: Applicability Section - The applicability states "Transmission Operators that maintain TRM" and all requirements of the standard are applicable to the TOP in regards to preparing

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			and maintaining a TRM Implementation Document (TRMID), distributing the TRMID to other interested parties, calculating TRM consistent with the TRMID, etc. It is unclear to FE what requirements are placed upon a Transmission Operator that DOES NOT maintain TRM. A TOP who does not maintain TRM could be interpreted one of two ways: 1) For a given TOP footprint TRM is not withheld in calculating ATC 2) TRM is withheld for the TOP footprint, but the TOP does not determine or calculate the TRM value withheld. If the appropriate interpretation is as described in item 1) above, it begs the question if this is a needed reliability standard. If TRM is truly a reliability need, it can not be optional for any TOP service area. If the latter, item 2 and FE's understanding, is the correct interpretation, then FE's position on responsibility remains that that the applicability of this standard should rest with the entity performing the calculation of TRM which in many areas of the country is the TSP organization. Since the SDT has elected to not make a change in this regard we are requesting the aforementioned variance for the MISO RTO area.
Lincoln Electric System	5	Negative	LES is concerned with the Transmission Operator being the responsible entity for MOD-008. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
AEP Marketing	6	Affirmative	AEP has a concern because the standard appears to have an internal ambiguity. The applicability states "Transmission Operators that maintain TRM" however, R1 requires that "Each Transmission Operator shall prepare and keep current a TRM Implementation Document (TRMID) ...." In the context of R1, it unclear what requirements are placed upon Transmission Operators that DOES NOT maintain TRM. In addition, the Purpose statement implies that TRM is used as a real-time operation value. It is not.
Barry Green Consulting Inc.	6	Negative	Greater standardization in the determination of TRM and monitoring of the on-going appropriateness of the amount set aside for TRM is required.
Constellation Energy Commodities Group	6	Negative	Greater standardization in the determination of TRM and monitoring of the ongoing appropriateness of the amount set aside for TRM is required.
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-008 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation 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 its 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-008 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and Attachment C of the MISO Open Access Transmission and Energy Market Tariff. 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

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Lincoln Electric System	6	Negative	LES is concerned with the Transmission Operator being the responsible entity for MOD-008. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
Volkmann Consulting	8	Negative	This standard does not show the applicability to the Transmission Service Provider. In RTOs the TSP is responsible for calculating and maintaining TRM. Delegation agreements can cover this. However, with the larger portion of the Eastern Interconnection covered by regional tariffs and TSP operation, this standard should speak directly to the TSP responsibilities
Electric Reliability Council of Texas, Inc.	10	Abstain	Although the Applicability Section is clear, some Requirements and Measures contain no clear applicability only to those Transmission Operators that maintain TRM in their transmission system and market operations.
Midwest Reliability Organization	10	Negative	The MRO is concerned with the Transmission Operator being the responsible entity for MOD-008. We believe that the responsible entity for these requirements should be the Transmission Service Provider.