

## Consideration of Comments on Initial Ballot — MOD-028-1

Entity	Segment	Vote	Comment
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-028-1 Area Interchange Methodology, MOD-029-1 Rated System Path Methodology and MOD-030-1 Flowgate Methodology In the "Purpose" section, all three standards state, "To increase consistency and reliability in the development and documentation of Transfer Capability calculations for "short-term use". Short-term is an undefined term and it applies that these standards do not apply to ATC calculations beyond the "short-term" period. In is recommended that the phrase for "short-term use" be removed from the purpose.
Great River Energy	1	Negative	GRE is concerned with the Transmission Operator being the responsible entity for MOD-028_R2-R7. GRE believes that the responsible entity for these requirements should be the Transmission Service Provider. It is GRE's opinion that a standard should not knowingly be written in a manner that requires delegation agreements to be created 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 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	Abstain	No WECC entity that has definitely elected to use MOD-28; therefore, we recommend no action.
New York Independent System Operator	2	Abstain	The NYISO abstains from voting on this proposed standard. The NYISO appreciates recent feedback from the Standards Drafting Team on several rounds of comments requesting that revisions be made to the language of this proposed standard in order to: (i) expressly accommodate the NYISO's FERC-approved market design and financial reservation based open access transmission system; and (ii) eliminate any possible question as to whether the NYISO's existing approach to calculating ATC satisfies the requirements of the proposed standards. The Standards Drafting Team has indicated that it believes that the NYISO's existing procedures are compliant with the proposed standard. Nevertheless, the NYISO is

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			abstaining in order to preserve its rights to seek a formal confirmation of its compliance from FERC or NERC.
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.
Duke Energy Carolina	3	Affirmative	While we support approval of this standard, bulk electric system facilities 161kV and below may have significant network response. Since these facilities may have significant impact on TTC/AFC, documentation should be required by the standard for those facilities 161kV and below which are equalized. This will provide transparency for impacted stakeholders.
Lincoln Electric System	3	Negative	LES is concerned with the Transmission Operator being the responsible entity for R2 through R7 for MOD-028. 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 R2 through R7 for MOD-028, not the Transmission Operator.
Alliant Energy Corp. Services, Inc.	4	Negative	We believe the responsible entity for R2 thru R7 should be the Transmission Service Provider, not the Transmission Operator.
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	Requirements R2 through R7 list the responsible entity as the Transmission Owner. The Transmission Service Provider should be the responsible entity.
Lincoln Electric System	5	Negative	LES is concerned with the Transmission Operator being the responsible entity for R2 through R7 for MOD-028. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
Lincoln Electric System	6	Negative	LES is concerned with the Transmission Operator being the responsible entity for R2 through R7 for MOD-028. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
Electric Reliability Council of Texas, Inc.	10	Abstain	Although stated in the Applicability Section of the Standard, the Requirements and Measures contain no clear applicability only to those Transmission Operators and Transmission Service Providers who utilize AIM in calculating ATC and TTC for their transmission system and market operations.
Midwest Reliability Organization	10	Negative	The MRO is concerned with the Transmission Operator being the responsible entity for R2 through R7 for MOD-028. We believe that the responsible entity for these requirements should be the Transmission Service Provider.