Unofficial Comment Form

Project 2010-04 Demand Data

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=afad275c348b4be984201ed38be98c02) to submit comments on the draft MOD-031-1 standard. The electronic comment form must be completed by 8:00 p.m. ET on **Wednesday, September 4, 2013**

If you have questions please contact Darrel Richardson via email or by telephone at 609-613-1848.

The project page may be accessed by clicking [here](http://www.nerc.com/pa/Stand/Pages/Project2010-04DemandData%28MOD-C%29.aspx).

## Background Information

NERC Reliability Standards MOD-016, -017, -018, -019, and -021 (referred to herein as the “MOD C” standards), were approved in the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Order No. 693. Collectively, the MOD C standards pertain to the collection of data necessary to analyze the resource needs to serve peak demand while maintaining a sufficient margin to address operating events as follows:

* MOD-016-1.1 - Documentation of Data Reporting Requirements for Actual and Forecast Demands, Net Energy for Load, Controllable Demand-Side Management
	+ Is the umbrella standard that contains the documentation required for the data collection requirements.
* MOD-017-0.1 - Aggregated Actual and Forecast Demands and Net Energy for Load
	+ Provides for the data requirements for actual and forecast peak demand and net energy for load.
* MOD-018-0 - Treatment of Nonmember Demand Data and How Uncertainties are Addressed in the Forecasts of Demand and Net Energy for Load
	+ Provides for the treatment of nonmember demand data and how uncertainties are addressed in the forecasts of demand and net energy for load.
* MOD-019-0.1 - Reporting of Interruptible Demands and Direct Control Load Management
	+ Provides for the collection of interruptible demands and direct control load management.
* MOD-021-1 - Documentation of the Accounting Methodology for the Effects of Demand-Side Management in Demand and Energy Forecasts
	+ Provides for the documentation of how Demand-Side Management demands are accounted for in demand and energy forecasts.

NERC initiated an informal development process to address directives in Order No. 693 to modify certain aspects of the MOD C standards. The first informal meeting was held in February 2013 at NERC’s Washington, D.C. office. Participants were industry subject matter experts (SMEs), NERC staff, and staff from FERC’s Office of Electric Regulation. The small ad hoc group of SMEs participated in discussions about the outstanding FERC directives and possible resolutions to address the directives. The group also discussed the six standards (MOD-016 through MOD-021) and identified issues with the present standards. The group very quickly identified MOD-020 as dealing with the operational time frame and concluded that it should not be addressed with the other standards at this time since they were applicable to the planning horizon.

Although a pure data reporting standard would be a candidate for retirement under Paragraph 81, the data being collected has a reliability purpose in the development of future assessments for resource adequacy. It was decided to present a pro forma standard that consolidates the remaining five MOD C standards into a single standard. Creating a single standard provides a means of ensuring data will be collected and shared among the necessary parties (LSEs, BAs, TPs, etc.) in both the United States and Canada.

This posting is soliciting comment on a pro forma standard and a Standard Authorization Request (SAR).

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.

## Questions

1. Do you have any specific questions or comments relating to the scope of the proposed standard action or any component of the SAR outside of the pro forma standard?

[ ]  Yes

[ ]  No

Comments:

2. Proposed MOD-031-1 consolidates and replaces the topics previously addressed by MOD-016 through MOD-019, and MOD-021, in addition to incorporating improvements and approaches to meet remaining directives. Do you agree with the approach in MOD-031-1?

[ ]  Yes

[ ]  No

3. If you have any specific comments on MOD-031-1, please indicate them here.

Comments: