Unofficial Comment Form (Standard)

Project 2011-INT-01 – Interpretation of MOD-028 R3.1 for FPL

# Instructions

Please **DO NOT** use this form for official commenting. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=83d33c83582c424c85360b937a8d172e) to submit comments on the SAR and draft MOD-028-2 standard (Area Interchange Methodology). The electronic comment form must be completed **November 16, 2011.**

If you have questions please contact Monica Benson at [monica.benson@nerc.net](mailto:monica.benson@nerc.net) or by telephone at 404-446-2573.

<http://www.nerc.com/filez/standards/2011-INT-01_Interpretation_MOD-028-1_FPL.html>

**Background Information**

MOD-028-1 Area Interchange Methodology is one of the three methodologies included in the ATC-Related MOD standards. Sub-requirement R3.1 of MOD-028-1 states the following:

**R3.1** For on-peak and off-peak intra-day and next-day TTCs, use the following (as well as any other values and additional parameters as specified in the ATCID):

NERC received a request to interpret this sub-requirement. The requester stated:

*By using the words “on-peak”, “off-peak”, and “intra-day” this requirement implies there would have to be separate TTC numbers for different portions of the current day. However, R5 of MOD-28 establishes the calculation frequencies and only requires an update to TTC once within the 7 days prior to the specified period where they are used in an ATC calculation. The clarification needed is on the ATC Drafting Team’s intent with respect to the quantity and timing of individual TTC calculations needed for use in the ATC calculations. Adherence to the implied intra day calculation requirement of R3.1 is resulting in additional work and creating coordination issues with other parties which are not calculating intra day TTC values.*

NERC assembled an Interpretation team made up of some of the members of the original ATC-TTC-CBM-TRM Drafting Team. While that Interpretation team was preparing its Interpretation, the Standards Committee requested the Interpretation Team use a “rapid revision” approach to clarify the requirement in question directly. (The Standards Committee confirmed that revising the standard rather than developing an interpretation was acceptable to the requester.) The Interpretation team discussed this approach, and developed a revision to the standard that is intended to eliminate the ambiguity present in the current version of the standard. Other minor corrections and errata were addressed as well.

Questions

1. Do you agree with the use of this “Rapid” approach to clarify the standard, rather than clarifying the standard through an Interpretation? If No, please explain your concerns.

Yes

No

Comments:

1. Does the language in the SAR adequately represent the issue raised in the interpretation request? If No, please provide your suggestions to modify the SAR.

Yes

No

Comments:

1. Does the proposed revision resolve the issue raised in the interpretation request? If No, please provide your suggestions to modify the standard.

Yes

No

Comments:

1. If you have any other comments on the SAR or on the proposed Standard that you have not provided above, please provide them here.

Comments:      