Individual or group. (51 Responses)
Name (31 Responses)
Organization (31 Responses)
Group Name (20 Responses)
Lead Contact (20 Responses)
IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (9 Responses)
Comments (51 Responses)
Question 1 (37 Responses)
Question 1 Comments (42 Responses)
Question 2 (34 Responses)
Question 2 Comments (42 Responses)
Question 3 (0 Responses)
Question 3 Comments (42 Responses)

Group
MRO NERC Standards Review Forum
Russel Mountjoy
No
No
The NSRF appericiates the effort of the ad hoc team in consolidating 6 standards in to one single MOD-001-2, particularly, the intention to keep the focus on developing and retaining requirements with material impact to the reliability of BES. The NSRF has the following recommendation in order to provide clarity to the proposed Standard. For Applicability 4.1.1, remove the reference to the Transmission Operator. For R1 and M1, change the responsibility from the Transmission Operator (TOP) to the Transmission Service Provider (TSP). We agree with the rationale offered by the Florida Municipal Power Agency (FMPA) regarding this change. In addition, we recognize that Project 2012-05 would also need to include conforming changes to the NERC Functional Reliability Model responsibilities of the TOP and TSP. For R4 and M4, change the responsibility from the Transmission Operator (TOP) to the Transmission Service Provider (TSP). We agree with the rationale offered by the Florida Municipal Power Agency (FMPA) regarding this change. In addition, we recognize that the Project 2012-05 would also need to include conforming changes to the TRMID definition in the NERC Glossary of Terms. For R5 and M5, change the responsibilities to refer only to the Transmission Service Provider (TSP).
Individual
Ross Kovacs
Georgia Transmission Corporation
No
No
No changes to the Requirements, excellent work by the MOD A team. The draft VSLs may need more work for Requirements 2 through 5; only Severe VSLs are included in the pro forma standard.
Individual
Joe O'Brien
NIPSCO
No

We support this project and the SAR.
No
As a TOP, TP, RP, and LSE in MISO, we do very little to comply with the present AFC MOD Standards (MOD-001, 004, 008, 030). MISO, a TSP, performs all the related work and the region reviews the applicable evidence at MISO. As a result a CFR has been drafted to formalize this arrangement and may be approved by FERC soon. (note that MISO uses FG methodology, n/a for MOD-028 and MOD-029). Regarding the MOD-A project, we would like to see the new standard written to reflect who is actually doing the work. To that end please consider the following revisions to the latest draft: In R1 and R4, replace “Transmission Operator” with “Transmission Operator or Transmission Service Provider” and in R5 replace “each Transmission Service Provider and Transmission Operator” with “each Transmission Service Provider or Transmission Operator”. Similar wording is used in R6. Thanks
Individual
Thomas Foltz
American Electric Power
Yes
The Transmission Operator should not be obligated to perform duties that they don't actually perform in practice. In AEP’s case for example, these obligations fall to the Transmission Service Provider. These proposed requirements do not accurately represent the way this work is performed in SPP or PJM. As a result, either a) the Transmission Operator should be replaced by Reliability Coordinator or Planning Authority as the Functional Entity in Section 4.1. or b) the standard should be re-written to be flexible enough to accommodate situations where the RTO peforms this role.
Though we support the overall efforts of the drafting team and the integration and consolidation of the proposed standards, AEP is choosing to vote negative on this project due to our objection to the Transmission Operator as an applicable Functional Entity, and does accommodate when the RTO performs this role. Due to the current volume of standards development activity, AEP is not able to apply the same level of rigor to this request for comment as we would normally. As a result, the comments provided in this response are those we deemed the most significant, and do not necessary reflect all the issues that AEP may, at some time, choose to address.
Individual
Catherine Wesley
PJM Interconnection
No
No
While we support the changes to the proposed standard we still think that in general these requirements could be better suited as NAESB business practices in the long term.
•Recommendation to include in R2 (ATCID) similar language that is in R1 for ATC calculations. •PJM supports language in R6 specific to the data sharing for AFC, ATC, TFC or TTC calculations as being required to support data sharing and transparency.
Group
Northeast Power Coordinating Council
Guy Zito
Yes
We agree with the general direction and the scope of revisions proposed in the SAR. However, there is a basic process and due diligence issue that deserves more focus than is being proposed. The basic issue is not so much about combining some displaced requirements; the issue is “What should be retained in the NERC Reliability Standards and what should be mapped to and adopted by NAESB as business practices, and what is NAESB’s input to the proposed mapping and what is its work plan to

implement such mapping." It must be emphasized that there is apparently a lack of coordination with other standard setting organizations to ensure the proposed retirements are properly managed and that parallel standard development activities will take place to implement standard changes at the same time. In general, we believe that regulatory authorities and industry participants support the concept that NERC address reliability and that NAESB address business practices. The Industry needs to weigh in on the discussion that leads to a recommendation as to which part goes where. However, as proposed, this posting is as a reliability standard only – there are no questions regarding the business practices or the NAESB issue. The SAR states that part of the objective is to retire market-based requirements, which we support; but the SAR is silent on any details which provide specificity on the scope of the proposed retirements, or transfer of the retired requirements to other standard setting organizations. The mapping document does not provide specific recommendations on which retired requirements are to be transferred to NAESB or other standard setting organizations. It is conceivable that some of the retired requirements will not have a home elsewhere but industry participants will need to adhere to such requirements, which may be processes or procedures, to support their business activities. Based on our understanding, NAESB has not been engaged in providing inputs on the proposed retirement, nor does it have any work plan to implement any or all of the proposed retired requirements. The draft Implementation Plan being posted mentions a proposed coordination process, but until NAESB has provided its inputs, the proposed process has not yet received the support from the party who is partly responsible for the successful and timely transfer of the NERC retired requirements. In previous projects, a close coordination between NERC and NAESB was achieved to ensure both parties agreed on the proposed mapping of NERC standard requirements, and that both were able and ready to implement the proposed changes to ensure a smooth transition without unduly impacting industry participants. For this project, from the available documents and based on our knowledge of the current activities, we are not convinced that the needed coordination with and inputs from NAESB have taken place.

No

(1) We do not agree with the Purpose statement as presented as it contains an unclear objective. The Purpose statement starts off with "To ensure the reliable calculation of Total Flowgate Capability (TFC) and Total Transfer Capability (TTC) values…". We do not think it appropriate to have an objective of "reliable calculation" in a NERC Reliability Standard; rather, we would see a need for a Reliability Standard having an objective to calculate TTC and ATC whose values provide a reliability basis for transmission service reservation and utilization. We therefore suggest the Purpose statement be revised as follows: Purpose: (1) To ensure the calculated values of Total Flowgate Capability (TFC) and Total Transfer Capability (TTC) provide a reliability basis when those values are used by a Transmission Service Provider to calculate Available Flowgate Capability (AFC) or Available Transfer Capability (ATC) or used by a Reliability Coordinator; (2)…. Further, Items (2) and (3) in the Purpose statement are not objectives or desired outcomes, they are actions or requirements. We suggest that (2) and (3) be reworded and combined as follows: To ensure sharing of information on the methodology and calculated values of TFC, TTC, AFC, ATC, Capacity Benefit Margin (CBM), and Transmission Reliability Margin (TRM) with entities having a reliability need for the information. (2) Part 1.1: It is unclear to us what the "this" in "A description of how this is accomplished;" means. Is it the statement required in Part 1.1, or is it the methodology or the incorporation of facility ratings, voltage limits, and stability limits pre and post-contingency. This is unclear and can lead to a Responsible Entity being unable to meet the Standard's requirements. (3) R3: The second part is not required. If a TSP does not use CBM, then there is no need for the TSP to have a CBMID on which the TSP states that it doesn't use CBM. This exclusion can be stated in the Applicability Section, or in the Measures. (4) R4: Same comment as in (3) preceding, except this is for TRM. (5) R5: The main requirement stipulates that: "Within 30 calendar days of receiving a written request that references this requirement…", it is unclear whether "this requirement" means R5, and if so, it would be clearer to just say Requirement R5. Also, do the requesting entities need to reference R5 to substantiate a request? If so, what is the rationale behind having to make this reference when the latter part of the requirement addresses the alternative scenarios in which such a reference is not required? NPCC participating members believe that requirements R5 and 6 should be eliminated under the P81 criteria; and therefore suggest deleting. However, if the Standard Drafting Team believes these Requirements are necessary for reliability we request an explanation and offer the following corrections: (6) R5, Parts 5.2 and 5.3: According to R3 and R4, the TSP is required to develop a

CBMID whereas the TOP is required to develop a TRMID. However, Part 5.1 requires that the TOP provide the CBMID while the TSP is required to provide the TRMID upon requests. The responsibilities of the TOP and the TSP seem to be incorrect in meeting the requests. (7) M5: Requirement R5 holds the TOP and TSP responsible for responding to requests for information. However, Measure M5 only lists the examples of evidence that the TSP needs to provide, but not the TOP. There is thus no Measure for the TOP to aid its provision of evidence to demonstrate compliance. We suspect this is an oversight. (8) R6: the same comment with respect to making a reference to “this requirement” as noted in (7) preceding. (9) R6, Part 6.1: This part appears to be a requirement for the requesters, but the part is not written to clearly indicate that. To avoid being interpreted as a requirement for the requester, we suggest to revise the main requirement R6 as follows: R6. Within 30 days of a written request that references this requirement from another Transmission Service Provider or Transmission Operator that specifies that the data is for use in the requesting party’s AFC, ATC, TFC, or TTC calculations, a Transmission Service Provider or Transmission Operator shall share data used in their respective AFC, ATC, TFC, or TTC calculations (subject to confidentiality, regulatory, or security requirements). The proposed change will turn an apparent requirement for the requesters into a condition for a valid request. (10) R6, Part 6.2: This is not a requirement, but a provision for the TSP and TOP to not have to do anything extra. We do not see the need for having this part to anticipate that there will be requests for data in a format that is different than the one a TSP or TOP uses, maintains, or currently makes available to others. If the SDT really wants to relieve the burden of the TSP and TOP from having to change the data format when such requests are made, the SDT may want to insert words such as “in the format that is currently used, maintained or made available” prior to “in their respective…” in the main requirement.
Individual
Denise Yaffe
Southern California Edison
No
No
SCE believes that the calculation of Total Transfer Capabilities and Total Flowgate Capabilities should be assigned to Transmission Service Providers, rather than to Transmission Operators.
Individual
Daniel Mason
HHWP
Yes
TOP's without ATC Paths and without transmission capacity that is sold through a TSP should be exempt from the applicabilty of MOD-001. An explicit exclusion is needed to ensure that resources are not being devoted to actions that produce no reliability benefit.
Group
PacifiCorp
Kelly Cumiskey
No
None relating to the scope of the standard.
No
None that haven’t been retained.
1) PacifiCorp is concerned that the language under M4 exceeds what an entity is required to provide to sufficiently meet compliance with R4. The current draft of the pro-forma standard states the following under R4: “Each TOP shall prepare, keep current, and implement a TRMID that describes its

method for establishing margins to protect system reliability." PacifiCorp maintains that a dated effective TRMID that is posted on the Transmission Operators website would be an appropriate example of evidence for meeting compliance with this requirement, however, the current language under M4 would require an entity to provide a dated effective TRMID and a "demonstration," such as a study report, that select currently active values of TRM were determined per the TRMID. The addition of a study report as a required piece of evidence is absent in the current version of MOD-008. As such, it's inclusion in the new standard transcends the intent of the requirement and the goal of the consolidation of the MOD A standards. PacifiCorp recommends removing the inclusion from M4 language; 2) PacifiCorp would like clarification on whether or not the periodicity highlighted in R1.4 implies that any updates to TFC or TTC should be regularly scheduled, or, should be provided on an as needed basis? PacifiCorp maintains that in the absence of significant changes to a path, requiring a specific cycle of updates is arbitrary to both functional entities.
Individual
Kenn Backholm
Public Utility District No.1 of Snohomish County
No
No
Snohomish supports the Project 2012-05 ATC Revisions (MOD A) Standard Drafting Team in its efforts to combine and clarify the family of MOD Reliability Standards that address transmission and its associated margins, methodologies, and related factors. However Snohomish is concerned with the "if" language in R1 and will be voting negative. Snohomish cannot identify any reliability benefits in applying MOD-001-2 to a TOP that does not operate facilities that a Transmission Service Provider uses to provide transmission service. In addition Snohomish does not perceive any reliability benefits to a TOP that does not operate facilities that are not part of a Flowgate or transfer path: does not contain a monitored Facility of a permanent Flowgate in the Eastern Interconnection, a major transfer path within the Western Interconnection, or a comparable monitored Facility in the ERCOT or Quebec Interconnections, and is not a monitored Facility included in an Interconnection Reliability Operating Limit (IROL). Below is the Applicability language for the Project 2012-05 ATC Revisions (MOD A) - MOD-001-2. Snohomish is proposing Exemptions 4.2.2 and 4.2.3. Applicability: 4.1. Functional Entity 4.1.1 Transmission Operator 4.1.2 Transmission Service Provider 4.2. Exemptions: The following is exempt from MOD-001-2. 4.2.1 Functional Entities operating within ERCOT 4.2.2 A Transmission Operator that does not operate facilities that a Transmission Service Provider uses to provide transmission service. 4.2.3 A Transmission Operator that operates facilities that are not part of a Flowgate or transfer path: does not contain a monitored Facility of a permanent Flowgate in the Eastern Interconnection, a major transfer path within the Western Interconnection, or a comparable monitored Facility in the ERCOT or Quebec Interconnections, and is not a monitored Facility included in an Interconnection Reliability Operating Limit (IROL). Snohomish intents to change its ballots from negative to affirmative if the proposed language above or other comparable changes are made to ensure that the MOD-001-2 Reliability Standard is not applicable to TOPs that are not used by TSP to provide transmission service and are not operating facilities that are monitored elements on Flowgate or major transformer paths as noted above. Thank you for the opportunity to provide comments.
Individual
Ross Kovacs
Georgia Transmission Corporation
No
No
No comments.
Individual

Jack Stamper
Clark Public Utilities
No
No
Clark supports the Project 2012-05 ATC Revisions (MOD A) Standard Drafting Team in its efforts to combine and clarify the family of MOD Reliability Standards that address transmission and its associated margins, methodologies, and related factors. However Clark is concerned with the “if” language in R1 and will be voting negative. Clark cannot identify any reliability benefits in applying MOD-001-2 to a TOP that does not operate facilities that a Transmission Service Provider uses to provide transmission service. In addition Clark does not perceive any reliability benefits to a TOP that does not operate facilities that are not part of a Flowgate or transfer path; does not have a monitored Facility of a permanent Flowgate in the Eastern Interconnection, a major transfer path within the Western Interconnection, or a comparable monitored Facility in the ERCOT or Quebec Interconnections, and is not a monitored Facility included in an Interconnection Reliability Operating Limit (IROL). Clark is a TOP that does not have any need to calculate AFC, ATC, TFC, TTC, CBM, or TRM values and believes other similar TOPs should be excluded from the applicability of the standard. Below is the Applicability language for the Project 2012-05 ATC Revisions (MOD A) - MOD-001-2. Clark is proposing Exemptions 4.2.2 and 4.2.3. Applicability: 4.1. Functional Entity 4.1.1 Transmission Operator 4.1.2 Transmission Service Provider 4.2. Exemptions: The following is exempt from MOD-001-2. 4.2.1 Functional Entities operating within ERCOT 4.2.2 A Transmission Operator that does not operate facilities that a Transmission Service Provider uses to provide transmission service. 4.2.3 A Transmission Operator that operates facilities that are not part of a Flowgate or transfer path: does not contain a monitored Facility of a permanent Flowgate in the Eastern Interconnection, a major transfer path within the Western Interconnection, or a comparable monitored Facility in the ERCOT or Quebec Interconnections, and is not a monitored Facility included in an Interconnection Reliability Operating Limit (IROL). Clark intends to change its ballots from negative to affirmative if the proposed language above or other comparable changes are made to ensure that the MOD-001-2 Reliability Standard is not applicable to TOPs that are not used by TSP to provide transmission service and are not operating facilities that are monitored elements on Flowgate or major transformer paths as noted above.
Individual
John Bee
Exelon and its' affiliates
Yes
As NERC representatives pointed out in recent webinars, one goal of many of the existing standard development projects is to seek a steady state for applicable standards. In order to avoid iterative development projects, the SARs should accommodate all known issues and/or recommendations. The recently issued Independent Experts Review Project cites a number of MOD requirements for attention. The scope of the SAR should include assessment and resolution of the Independent Expert Review Report recommendations. Additionally, to the extent related, the recently submitted risk assessment by the RISC should be considered when developing the scope of SARs. Further, for any MOD standards that require actions associated with a designated PC must accommodate the situation in which a PC is not named. While this issue is known and under consideration within the impacted Regions, the SAR should acknowledge this compliance gap and enable development of exemption language or other means to avoid an inappropriate compliance obligation. Exelon supports the concept of developing Compliance Guidance concurrently with the Standard development because it makes sense to develop audit explanations and tools while the intent and information is fresh and under development. In addition, this is very useful for Registered Entities to understand how compliance will be judged. However, it is not clear how development of Compliance Input is to be conducted. The Compliance Input should evolve as the Standard language evolves through the standards development process and must ultimately reflect the actual language in the final, approved

standard. Understanding that no ballot is associated with Compliance Input, it would be very useful for NERC to post Compliance Input with a separate comment form for stakeholder input. Some of the project SARs cite development of an RSAW. Stakeholder Review and comment on RSAWs and Compliance Input prior to the final ballot of a proposed standard will be mutually beneficial.
No
Exelon supports the draft team's judgment in removing LSE applicable from MOD-001-2.
Individual
Long Duong
Public Utility District #1 of Snohomish County
No
No
Snohomish supports the Project 2012-05 ATC Revisions (MOD A) Standard Drafting Team in its efforts to combine and clarify the family of MOD Reliability Standards that address transmission and its associated margins, methodologies, and related factors. However Snohomish is concerned with the "if" language in R1 and will be voting negative. Snohomish cannot identify any reliability benefits in applying MOD-001-2 to a TOP that does not operate facilities that a Transmission Service Provider uses to provide transmission service. In addition Snohomish does not perceive any reliability benefits to a TOP that does not operate facilities that are not part of a Flowgate or transfer path: does not contain a monitored Facility of a permanent Flowgate in the Eastern Interconnection, a major transfer path within the Western Interconnection, or a comparable monitored Facility in the ERCOT or Quebec Interconnections, and is not a monitored Facility included in an Interconnection Reliability Operating Limit (IROL). Below is the Applicability language for the Project 2012-05 ATC Revisions (MOD A) - MOD-001-2. Snohomish is proposing Exemptions 4.2.2 and 4.2.3. Applicability: 4.1. Functional Entity 4.1.1 Transmission Operator 4.1.2 Transmission Service Provider 4.2. Exemptions: The following is exempt from MOD-001-2. 4.2.1 Functional Entities operating within ERCOT 4.2.2 A Transmission Operator that does not operate facilities that a Transmission Service Provider uses to provide transmission service. 4.2.3 A Transmission Operator that operates facilities that are not part of a Flowgate or transfer path: does not contain a monitored Facility of a permanent Flowgate in the Eastern Interconnection, a major transfer path within the Western Interconnection, or a comparable monitored Facility in the ERCOT or Quebec Interconnections, and is not a monitored Facility included in an Interconnection Reliability Operating Limit (IROL). Snohomish intents to change its ballots from negative to affirmative if the proposed language above or other comparable changes are made to ensure that the MOD-001-2 Reliability Standard is not applicable to TOPs that are not used by TSP to provide transmission service and are not operating facilities that are monitored elements on Flowgate or major transformer paths as noted above. Thank you for the opportunity to provide comments.
Individual
Melissa Kurtz
US Army Corps of Engineers
Agree
Florida Municipal Power Agency
Group
BC Hydro and Power Authority
Patricia Robertson
No
No
R3: BC Hydro votes Negative, see comments below. R5: BC Hydro votes Negative, see comments

below. R3 Comments: R3 seems to say if a TSP does not use CBM, the TSP is still required to keep current a CBCID. On the other hand, M3 seems to indicate that evidence of CBMID is required only if the TSP uses CBM. M3 is a better approach. If a TSP does not use CBM, it can simply state in its ATCID that the CBM value is zero; it does not make sense to keep current a CBMID in this case since the TSP is responsible for both ATCID and CBMID. No one would need to review the TSP's CBMID to confirm that the CBM value is zero. Unlike R4, TRMID is the responsibility of the TO who could be a different organization from its associated TSP. The requirement for keeping current a TRMID may be reasonable even if the TO does not use TRM. R5 Comments: R5.2.1. CBMID should be changed to TRMID R5.3.2. TRMID should be changed to CBMID
Group
seattle city light
paul haase
Agree
Snohomish PUD
Individual
Michael Falvo
Independent Electricity System Operator
Yes
We question the need to ask this question when the consolidated standard is already posted for commenting and balloting. The intent of posting a SAR for comment is to seek industry's input on the need and scope of a proposed standard development/revision project. Posting the standard for balloting at the same time suggests that there is already a foregone conclusion on the need and the scope for this project , and that the industry's input on SAR would seem irrelevant. The IESO understands that posting a SAR and the draft standards for comment at the same time can improve standard development efficiency, and we support it to the extent that sufficient technical information has been obtained to facilitate the development of a draft standard at the informal outreach stage. However, we are very concerned about the fact that the industry was asked to ballot the draft standard when the need and scope of the draft standard have not been commented on and supported by the industry, and the standard itself has not been drafted by a formal standard drafting team. Such an approach appears to: a. Deviates from the normal standards development process as presented in the Standards Process Manual (SPM); b. Contradicts and perhaps violates the intent of the established standard development process and ANSI principles to have new and revised standard formally developed through an open and inclusive process before being presented to the RBB for balloting. The industry is being asked to ballot a set of standards that has not been formally developed. This concept appears to be fundamentally flawed. We propose that the SDT convey our concern to the NERC senior management and the Standards Committee. We further suggest that NERC and the SC evaluate alternative approaches or make revisions to the SPM to provide the needed flexibility that can further improve the efficiency in standard development if certain elements in the existing SPM are assessed to restrict such improvements. Notwithstanding the above, we agree with the general direction and the scope of revisions proposed in the SAR. However, there is apparently a lack of coordination with other standard setting organizations (eg. NAESB) to ensure the proposed retirements are properly managed and that parallel standard development activities will take place to implement standard changes at the same time. The SAR states that part of the objective is to retire market-based requirements, which we support; but the SAR is silent on any details which provide specificity on the scope of the proposed retirements, or transfer of the retired requirements to other standard setting organizations. The mapping document does not provide specific recommendations on which retired requirements are to be transferred to NAESB or other standard setting organizations. From the available documents and based on our knowledge of the current activities, NAESB has not been engaged in providing inputs on the proposed retirement, nor does it have any work plan to implement any or all of the proposed retired requirements.
(1) We do not agree with the purpose statement as presented as it contains an unclear objective. The purpose statement starts off with "To ensure the reliable calculation of Total Flowgate Capability (TFC) and Total Transfer Capability (TTC) values…". We do not think it appropriate to have an objective of

“reliable calculation” in a NERC Reliability Standard; rather, we would see a need for a Reliability Standard having an objective to calculate TTC and ATC whose values provide a reliability basis for transmission service reservation and utilization. We therefore suggest the purpose statement be revised as follows: Purpose: (1) To ensure the calculated values of Total Flowgate Capability (TFC) and Total Transfer Capability (TTC) provide a reliability basis when those values are used by a Transmission Service Provider to calculate Available Flowgate Capability (AFC) or Available Transfer Capability (ATC) or used by a Reliability Coordinator; (2)…. Further, Items (2) an d(3) in the purpose statement are not objectives or desired outcome, they are actions or requirements. We suggest that (2) and (3) be reworded and combined as follows: To ensure sharing of information on the methodology and calculated values of TFC, TTC, AFC, ATC, Capacity Benefit Margin (CBM), and Transmission Reliability Margin (TRM) with entities having a reliability need for the information. (2) Part 1.1: It is unclear to us what the “this” in “A description of how this is accomplished;” means. Is it the Statement required in Part 1.1, or is it the methodology or the incorporation of facility ratings, voltage limits, and stability limits pre- and post-contingency. The is unclear and can lead to a Responsible Entity unable to meet standard requirements. (3) R3: The second part is not required. If a TSP does not use CBM, then there is not a need to the TSP to have a CBMID on which the TSP states that it doesn’t use CBM. This exclusion can be stated in the Applicability Section, or in the Measures. (4) R4: Same comment as in (4), above, except this is for TRM. (5) R5: The main requirement stipulates that: “Within 30 calendar days of receiving a written request that references this requirement…”, it is unclear whether “this requirement” means R5, and if so, it would be clearer to just say Requirement R5. Also, do the requesting entities need to reference R5 to substantiate a request? If, what is the rationale behind having to make this reference when the latter part of the requirement addresses the alternative scenarios in which such a reference is not required? (6) R5, Parts 5.2 and 5.3: According to R3 and R4, the TSP is required to develop a CBMID whereas the TOP is required to develop a TRMID. However, Parts 5.2 and 5.3 require that the TOP provide the CBMID and the TSP provide the TRMID upon requests. The responsibilities of the TOP and the TSP seem to be incorrect in meeting the requests. (7) M5: Requirement R5 holds the TOP and TSP responsible for responding to requests for information. However, Measure M5 only lists the examples of evidence that the TSP needs to provide, but not the TOP. There is thus no Measure for the TOP to aid its provision of evidence to demonstrate compliance. We suspect this is an oversight. (8) R6: the same comment wrt making a reference to “this requirement” as provided under (8) above. (9) R6, Part 6.1: This part appears to be a requirement for the requesters, but the part is not written in that fashion. To avoid being interpreted as a requirement for the requester, we suggest to revise the main requirement R6 as follows: R6. Within 30 days of a written request that references this requirement from another Transmission Service Provider or Transmission Operator that specify that the data is for use in the requesting party’s AFC, ATC, TFC, or TTC calculations, a Transmission Service Provider or Transmission Operator shall share data used in their respective AFC, ATC, TFC, or TTC calculations (subject to confidentiality, regulatory, or security requirements). The proposed change will turn an apparent requirement for the requesters into a condition for a valid request. (10) R6, Part 6.2: This is not a requirement, but a provision for the TSP and TOP to not having to do anything extra. We do not see the need for having this part to anticipate that there will be requests for data in a format that is different than the one a TSP or TOP uses, maintains, or currently makes available to others. If the SADT really wants to relieve the burden of the TSP and TOP form having to change the data format when such requests are made, the SDT may want to insert a few words such as “in the format that is currently used, maintained or made available” prior to “in their respective…” in the main requirement. (11) The proposed effective date may conflict with Ontario regulatory practice with respect to the effective date of the standard. Note that there is an approval requirement in Ontario for NERC Reliability Standards. The wording presented in the Effective Dates Section does not reflect this. It is suggested that this conflict be removed by moving the wording: “,or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities” to immediately after “applicable regulatory approval” in Item 1 of the Effective Dates Section. This proposed wording change also applies to the Effective Dates Section in the Implementation Plan.
Group
SERC Planning Standards Subcommittee (PSS)
Jim Kelley
No

Yes
The SDT is requested to review MOD-30-2, to incorporate the intent found in 5.3: For external Flowgates, identified in R2.1.4, use the AFC provided by the Transmission Service Provider that calculates AFC for that Flowgate Further request the SDT review the draft standard to ensure that the neighboring entity's flowgates are not placed in an oversubscribed position due to overselling transmission service.
Request the SDT to add a sentence to 1.3. The methodologies shall include any reliability-related constraints that are requested to be included by another Transmission Operator, provided the constraints are also used in that Transmission Operator's TFC or TTC calculation. This will ensure that the facility owners reliability needs through TRM and CBM will be protected and used in any other entity's purchase or selling of ATC. The comments expressed herein represent a consensus of the views of the above named members of the SERC PSS only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.
Group
Hydro One Networks Inc.
Sasa maljukan
Agree
The NPCC Regional Standards Committee (RSC) In addition to NPCC RSC comments Hydro One believes that there is a clear violation of the SPM because the standards is balloted at the same time the SAR is posted. Because of we'll be voting casting Negative vote in this project.
Individual
Brett Holland
Kansas City Power & Light
Agree
Florida Municipal Power Agency
Group
Florida Municipal Power Agency
Frank Gaffney
No
No
FMPA is very appreciative of the efforts of the ad hoc team in boiling down the MOD standards to its essentials. In general, FMPA is in favor of the approach of the standard. There is only one significant issue that is causing FMPA to vote Negative (and one significant typo). The calculation of TTC/TFC and TRM ought to be the responsibility of the TSP, not the TOP. Hence, R1 and R4 ought to apply to the TSP, not the TOP. The only applicability to the TOP within the standard ought to be provision of data required to assist the TSP in calculating TTC, such as models and SOLs. FMPA believes that TTC/TFC and TRM are commercial values that may be indicative of reliability limits, but are strictly commercial in nature. Nowhere in the standards does it require RCs or TOPs to operate to TTC/TFC; the requirements are for RCs and TOPs to operate to SOLs and IROLs. Hence, it is FMPA's opinion that ultimately all of the TTC/TFC, ATC/AFC, CBM and TRM calculation requirements should be within NAESB standards as business practices with appropriate integration between NERC and NAESB standards similar in nature to IRO-006 (NERC) and WEQ-008 (NAESB) regarding Transmission Loading Relief. However, FMPA also recognizes that modifications to the NAESB standards are probably required before these MOD standards can be completely retired and we recognize the need for a transitional step. In the meantime and in any event, TTC/TFC, ATC/AFC, CBM and TRM calculation requirements should all be the responsibility of TSPs, not TOPs. FMPA believes that TTC/TFC are commercial values whereas SOLs and IROLs are reliability values. SOLs and IROLs are what the RCs and TOPs operate to. The TSP should not allow TTCs to exceed SOLs (already reflected in the proposed R1, bullet 1.1); but, with that recognition, TTCs are indicative of SOLs, not

synonymous. An analogy might help. As far as we understand it, to reliably operate an airplane, the airline is concerned about weight and distribution of weight within the plane. So, the operating limits are those weight limits which are analogous to SOLs. Airlines transact within these limits by selling a certain number of tickets and scheduling a certain amount of cargo, so, TTC/TFC is analogous to the number of seats in a plane and amount of cargo space available; ATC/AFC is analogous to the number of seats not sold yet and cargo space not sold yet; TRM and CBM are analogous to "safety" factors between the expected weight and the design limits; but, it is the actual weight (of the passengers, luggage, fuel and cargo) that is operated to against the design limits of the plane. The tickets and cargo space to be sold are commercial in nature. If the weight is too much, the airline will cancel certain cargo scheduled for that plane, similar to a TLR procedure. So, by way of analogy, the TOP should tell the TSP what the maximum product is available for sale (SOLs, IROLs) and the TSP ought to be subject to business practices to: 1) make sure that the volume of product they sell does not exceed the maximum (i.e., that TTCs do not exceed SOLs as already included in R1, bullet 1.1); and 2) maintain contractual commitments while minimizing oversubscribtion and minimizing curtailment through TRM, CBM and ATC/AFC calculations. At minimum, any NERC requirements regarding the TTC/TFC and TRM calculations should be imposed on the TSP. FMPA understands that most entities who are TOPs are also TSPs; and hence, whether the TOP or TSP does the TTC/TFC and TRM calculations may be a moot issue for them. However, many FMPA members are TOPs (several for only one substation that only serves that member's load) without being TSPs and are currently required to calculate a TTC/TFC and TRM that is never used by anyone, a wasted administrative and software expense required only because of the way the existing MOD standards are applicable to TOPs. FMPA suspects this is true throughout many non-RTO areas with small TOPs. The proposed standard tries to alleviate this issue by reducing the applicability of R1 to a TOP that calculates a TTC/TFC "used by that TOP", requested by its TSP, or requested by its RC. However, FMPA does not believe there is enough clarity to make it clear to an auditor that a TOP that is not a TSP does not "use" TTC. For instance, let's say that a fictional Global Electric Utility ("Global") is a large verticaly intergrated utility that is both a TOP and TSP and Global has a small utility, Village Electric Utility ("Village"), connected to it. Village is a TOP but not a TSP and does not have an OATT. For the interface between Global and Village, Global will calculate TTC and have an ATC path to Village. Village is not a TSP, does not have a corresponding ATC path for its "side" of the interface, and does not need to calculate TTC. So, does Village "use" the TTC for the ATC path within the meaning of the first bullet of R1? Although Village does not use the TTC as an input to calculating ATC, Village does use the ATC path as a transmission customer to Global. Would an auditor interpret this "use" as customer as triggering R1 applicability to Village? Assigning TTC/TFC and TRM calculations to the TOP also causes implementation challenges and conflicts with other regulations. For instance, FERC Regulations 18 CFR §§ 37.6(b)(2) states: "(2) Calculation methods, availability of information, and requests. (i) Information used to calculate any posting of ATC and TTC/TFC must be dated and time-stamped and all calculations shall be performed according to consistently applied methodologies referenced in the Transmission Provider's transmission tariff and shall be based on Commission-approved Reliability Standards as well as current industry practices, standards and criteria." If a TSP has more than one TOP within it, how can a TSP ensure that the calculation of TTC/TFC is "performed to consistently applied methodologies referenced in the Transmission Provider's transmission tariff"? In other words, how can one TSP with multiple TOPs ensure the TTC/TFC methodologies are consistent? FERC Regulations 18 CFR §§ 37.6(b)(2) continues with: "(ii) On request, the Responsible Party must make all data used to calculate ATC, TTC, CBM, and TRM for any constrained posted paths publicly available (including the limiting element(s) and the cause of the limit (e.g. , thermal, voltage, stability), as well as load forecast assumptions) in electronic form within one week of the posting." How can a TOP that is not a TSP post anything? They will not have an OASIS. FERC Regulations 18 CFR §§ 37.6(b)(3)(i)(C)(3) continues with: "(3) When the monthly and yearly capability posted under paragraphs (b)(3)(i)(A) and (B) of this section are updated because of a change in TTC/TFC by more than 10 percent, the Transmission Provider shall post a brief, but specific, narrative explanation of the reason for the update." Most of this regulation presumes that an OASIS site is being utilized; however, a TOP that is not a TSP will not have an OASIS site. Also, Order 782 that approved revisions to MOD-028 et.al., P 15-16, discusses potential market related concerns with the additional flexibility afforded to TOPs calculating TTC under the revised standard. FERC dismisses that concern by accepting NERC's arguments that entities will implement MOD-028-2 consistent with OATT legal obligations and Commission market oversight authority. Specifically, FERC found that the potential for TTC calculations to skew ATC values can be "mitigated through complaints and market oversight

authority". In addition, "transmission operators must implement the revised Reliability Standard MOD-028-2 in a manner consistent with their existing legal obligations, including their obligations under their open access transmission tariffs." However, small TOPs that are not TSPs will not have a pro forma OATT. Thus, the various Orders and regulations make more sense, and operate more coherently if TTC/TFC calculations are conducted under the auspices of an OATT. This intent can best be achieved by making the TSP responsible for calculating all of the values used in provision of transmission service – TTC/TFC, TRM, CBM and ATC/AFC – and not the split of responsibilities identified in the draft standard. Nor is reliability advanced by making TOPs that are not TSPs responsible for TTC/TFC and TRM calculations. FMPA is aware that some regions may actually operate to TTC/TFC rather than SOLs/IROLs (e.g., WECC). For those regions, a Variance or Regional Standard may be appropriate. However, those regions should not cause the rest of the continent to become out of alignment with the Code of Federal Regulations and FERC Orders. The intent of the standards is for TOPs to operate to SOLs and IROLs, while TSPs handle the commercial matters of selling transmission. As such, FMPA believes that the TSP should calculate TTC/TFC/TRM; however, if the SDT does not take FMPA's recommendation and decides to retain the TOP as the applicable entity, then the Applicability to TOPs, Section 4.1.1, should be changed to: "Transmission Operator required by contract with a Transmision Service Provider to calculate TTC/TFC or TRM used by that Transmision Service Provider for purpose of calculating ATC/AFC". A significant typo: the proposed standard makes TSPs responsible for CBM and TOPs responsible for TRM (which, as discussed above, we believe should be the TSP); however, R5 reverses this in bullets 5.2.1 and 5.3.2, making the TOP responsible for the CBMID, and the TSP responsible for the TRMID.
Individual
Donald Weaver
New Brunswick System Operator
Agree
NPCC Reliability Standards committee
Individual
Kathleen Goodman
ISO New England Inc.
Agree
ISO/RTO Council Standards Review Committee (SRC)
Individual
Michael Moltane
ITC
R6.2 is really not a distinct requirement and the verbage should be included as a 2nd sentence in R6.1. Further, R6.1 does not need to be separate but should be included at the end of R6. I.e., add the language in R6.1 and R6.2 at the end of R6.
Individual
Diane Barney
New York State Dept of Public Service/NARUC
It is premature to be voting at all for the standard at this point in the process. Two major pieced of information are missing. First, the SAR has not been adopted, so we do not know if the proposed standard conforms to an adopted SAR. Second, the proposed standard was drafted by a small team of subject matter experts and has not yet been subject to a NERC wide critical review. Therefore, we do not yet know if there is a fatal flaw in the standard for some system(s) across NERC not represented by the SMEs, or if there is an outstanding idea to improve the draft the standard.
Individual

Nazra Gladu
Manitoba Hydro
No
(1) Rational for R1 - for clarity, add the words [TFC and TTC] before the word “values” in the following sentence, “Having a current and accurate description of this process allows neighboring systems and their Transmission Service Provider to understand how the [TFC and TTC] values were determined.”. (2) M1, Rational for R6, 1.2 Evidence Retention, VSL R5, VSL R6 - for clarity, consider replacing the word “entity” with [registered entity] in the above sections of the standard. (3) Purpose - consider inserting the acronyms [TSP, RC and TOP] following “Transmission Service Provider”, “Reliability Coordinator” and “Transmission Operator” in this section. Furthermore, replace all other instances of these words with their acronyms throughout the rest of the standard. (4) Implementation Plan - replace the words “Board of Trustee approval” with “Board of Trustees’ approval” for consistency with the Effective Dates section of the document. (5) General Comment - replace “Board of Trustees” with “Board of Trustees’” throughout the applicable documents/standards for consistency with other standards. (6) A. 3. Purpose – there is a reference in (1) to ‘…or used by a Reliability Coordinator’, however there is no indication as to what the Reliability Coordinator would use the information for. References in the other requirements indicate that only that the Reliability Coordinator may request this information, but do not indicate the use by the Reliability Coordinator in performing calculations governed by this standard. On the other hand, Transmission Operators are not mentioned in the purpose statement, but there are repeated requirements in the standard that relate to Transmission Operators and their use of these methodologies. Moreover, references are made in the purpose statement (and throughout the standard) to ‘entities with a reliability need for the information’. Is this need to be determined at the functional entity’s discretion? There is no guidance given as to how this need is to be determined or what information would be relevant in assessing whether a reliability need had been demonstrated adequately to meet this. (7) A, 4.2 – ERCOT should be defined. (8) R1, R2, R3 and R4 – each of these requirements require that the functional entity ‘keep current’ their methodologies. However, there is no guidance given as to how that process will be assessed. Do functional entities need to be updated immediately upon any change and/or immediately upon any change requested by another entity? or would it be acceptable to update on some periodic basis, i.e. monthly, bimonthly, etc? (9) R1 – reviewing the rationale for R1, it suggests that TFC and TTC values are only important when they are used to determine AFC and ATC or in the real time operations of the transmission system. However, R1 indicates that a TO must prepare, keep current and implement such a methodology if requested by the TSP or its RC. Please clarify that the intent is that if requested, the TO must start using such a methodology even if they hadn’t already been using it for calculating TFC and TTC? (10) R1, 1.3 – there doesn’t appear to be any ability for the TO to refuse the request from another TO to include certain constraints in their methodology. The way the requirement reads, if requested, it must be included. Please clarify if this is the case. (11) R1, 1.4 – Manitoba Hydro suggests that this statement be modified to first include a requirement that the methodology be provided to the TSP by the TO, before it addresses the periodicity of the provision. (12) M1, M2, M3 – the requirements don’t contemplate publishing and posting the information online, whereas the measures indicate that this would be an example of evidence. For example, R5 would suggest that it need not be posted or published, but this is not clear in the earlier Measures. Please clarify. (13) R3 – this requirement suggests that even if the functional entity does not use CBM, they would still be required to prepare, keep current and implement a CBMID. Would it be acceptable for the CBMID to only include a statement that CBM is not used, or is something more required? The same comment applies for R4. (14) R5, R6 – Manitoba Hydro believes that the SME’s should confirm that the 30 calendar day timeline is realistic for providing the information set out in the requirement. (15) R5, R6 – the requirement to provide the data is subject to confidentiality, security and regulatory requirements. Presumably these are confidentiality, security and regulatory requirements of the TSP or TO, and the determination of whether such requirements apply will be at their discretion/opinion. (16) M5 – It would seem that requirement R5 applies to both TSPs and TOs, but the measure only refers to TSPs response to a request, not a TOs. (17) R6 – Manitoba Hydro suggests modifying the language to include the words ‘provided that’ at the end of the opening paragraph before 6.1 and 6.2 as 6.1 and 6.2 are actually qualifiers to the requirement in

R6 and it should be written so that they are read together. (18) M6 – the measure refers to a case where the data request may be for data provided on an interval basis. Manitoba Hydro believes that this isn't actually contemplated by the requirement itself which only refers to a 30 day timeline for providing data. (19) Compliance, 1.2 – some clarity as to what's included in the 'other components of implementation and methodology documents' is needed in this section. (20) VSLs, R1 – it's unclear whether these are referring to the requirement elements that are set out in 1.1 or 1.2 or 1.3 or all of them.

Group

Puget Sound Energy

Pete Jones

No

Yes

In reference to R 1.1 of the new standard - The standard as written asks that each Transmission Operator shall prepare a TTC methodology and include a "rationale for the selection of the TTC method being used." Relative to compliance enforcement, this language seems vague, especially when compared to the existing standards. With the existing TTC methodology standards (MOD-028, -029, and -030), it is fairly clear as to what methods of TTC analysis are acceptable and how an auditor would gauge compliance (e.g. contingency list, stability impacts, ATCID modeling criteria, etc.). If the intent is that the Transmission Operator is expected to utilize an existing approved method for TTC determination (all or parts of Area Interchange, Rated System Path, Flowgate), it should be made clear in the standard. In short, how would an auditor verify a TTC methodology rationale as being sufficient for TO/TSP compliance?

In reference to R 1.3.1 of the new standard - With respect to distribution factors, the draft standard states that the "TO shall use . . . PTDF or OTDF of five percent or less when determining if . . . constraints should be monitored." As a threshold measure of statistical significance, the PTDF/OTDF is better expressed as a minimum value to warrant monitoring a particular outage/contingency. (i.e. "PTDF/OTDF values of 5 percent or greater should be considered when determining if constraints should be monitored.") It is less confusing that way (see MOD-030-1, R 2.1.4.1). Also, we suggest giving the Transmission Operator the option of including any distribution factors below the minimum as desired (see MOD-030-1, R 2.1.4.1). Further, as R 1.3.1 is under R 1.3, can we assume that this PTDF/OTDF threshold of 5 percent applies only to those constraints that are requested by another TO (R 1.3)? If so, this could be made clearer in R 1.3.1

Group

Oklahoma Gas and Electric Co.

Donald Hargrove

No

No

We thank the ad hoc team for their effort in reviewing and proposing a consolidated standard covering the ATC process. The resulting product provides a solid basis for further work in this area. In the RTO/Regional Tariff environment TTC/TFC, ATC/AFC, CBM and TRM calculation requirements are all the responsibility of the TSP, not TOPs. The Transmission Owners supply their Facility Ratings and contractual limits to the TSP who then performs the TTC/TFC, ATC/AFC, CBM and TRM calculation. Also, we suggest removing the TOP from the applicability section 4.1.1, and change the responsibility from the TOP to the TSP in requirements R1, R4, and R5. We recognize that this change would also require conforming changes to the NERC Functional Reliability Model responsibilities of the TOP and TSP. Finally, it appears that TRMID should be listed in section R5.2 and CBMID should be listed in section R5.3. However, we recommend that the posting of (or providing of) all four (4) methodologies/identification documents be the responsibility of the TSP to more accurately reflect who performs these functions in an RTO/Regional Tariff environment.

Group
ISO/RTO Standards Review Committee
Greg Campoli
Yes
The SRC supports the basic concept of combining standards into coherent groups where such grouping adds clarity and efficiency. And if this were to be a reliability standard the SRC would prefer the proposed PRO FORMA approach suggested in this posting than the current detailed set of HOW TO standards. However, there is a basic issue that deserves more focus than is being provided by this abridged version of the SPM (i.e. posting SAR, Standard and simultaneously Balloting a request). In this case the basic issue is not combining some displaced requirements; the issue is "What belongs to NERC and what belongs to NAESB?" This critical discussion has the potential of being overlooked if the posting is passed on the first ballot. The SRC suggests that the drafting team poll the industry to identify those requirements that should be removed as NERC reliability standards and should either be addressed in other venues or be deleted per the criteria used in the Paragragh 81 project. There are people who believe that 'transfer capacities" are market issues (SOLs and IROLs being the reliability side of that position). FERC supports the concept that NERC address reliability and that NAESB address Business Practices. The Industry must weigh in on this discussion. Regarding the specific scope posted with this SAR, the SRC must note that the completed posted FORM does not provide the "answers" required by the SAR INFORMATION section. To the question "of Industry Need (what is the problem)", the posting states that the Industry need is to resolve FERC directives and to include other administrative information. The SRC does not believe that that answer is responsive to the question. The SRC would ask that the answer respond to the which reliability problem is being resolved. Regarding the Purpose or Goal (How does the request propose to address the above problem), the posting states it will consolidate reliability requirements and retire market-based requirements. Because the need statement is defined in terms of directives and not in terms of reliability the answer does not address the original intent of this question. The SRC would prefer that the posting be assigned to NAESB rather than be retained and debated by NERC. Regarding the Identification of Objectives (What SPECIFIC reliability deliverables are required to achieve the goal?) The Posted FORM states the specific deliverables are addressing FERC directives. The SRC is not questioning the motivation for the Project, but it is questioning whether or not the Posted Form responses are appropriate to allow the Industry to understand what the proposal is. The brief description states that the "pro forma standard requirements" are placed within a new version of MOD-001. The SRC does not see where R3 MOD-004-1 (CBM), R4 MOD-008-1 (TRM), R5 MOD-028-1 (ATC), et al address reliability issues. In short, the Standards Authorization Request Form that we are asked to comment upon does not address the text in the Form nor does it address the questions required by the FORM. Is the Industry being asked to comment upon changes made to MOD-001-1a or is the Industry to comment about whether and which MOD standards are reliability issues and which should be retired, referenced to NAESB or any other actions.
No
Regarding the posted MOD-001-2 the SRC would again state this posting addresses Business Practices and not reliability requirements. Of the posted changes to MOD-001-1a the SRC would comment: R1.1 bullet 3 is not a reliability issue. There are already IROL and SOL requirement. R1.1. bullet 4 is informational and not a reliability issue R1.2 bullet 1 is informational and not a reliability issue R1.2 bullet 2 requires more details. Given the fact that additions and retirements are in constant flux, and require the TOP to make assumptions which are dependent on conditions at that time and not subject to a fixed rule, this bullet should be removed. R1.2 bullet 7 requires more details. Given the fact that additions and retirements are in constant flux, requiring the TOP to make assumptions which are dependent on conditions at that time and not subject to a fixed rule, this bullet should be removed. M1 states that the TOP must provide a statement that "such a request has not been made". This appears to be a requirement for the sake of a requirement and does not address any R1 reliability requirement. R2, R3, R4, R5 and R6 are documentation requirements and as such better belong in a category outside of mandatory reliability standards and most likely better suited to NAESB's Business requirements. R5, Parts 5.2 and 5.3: According to R3 and R4, the TSP is required to develop a CBMID whereas the TOP is required to develop a TRMID. However, Part 5.1 requires that

the TOP provide the CBMID while the TSP is required to provide the TRMID upon requests. The responsibilities of the TOP and the TSP seem to be incorrect in meeting the requests. M5: Requirement R5 holds the TOP and TSP responsible for responding to requests for information. However, Measure M5 only lists the examples of evidence that the TSP needs to provide, but not the TOP. There is thus no Measure for the TOP to aid its provision of evidence to demonstrate compliance. We suspect this is an oversight. General: 1. What is the rationale for requesting 5 year retention on methodology documents? 2. Request greater clarification on the second sub bullet of Evidence retention Sec. 1.2. What is by “calculations and other components of implementation” and for the most recent 14 days, etc. What is meant by the word “values”? ATC, TFC, TTC? 3. Regarding frequency of AFC, ATC calculations, if TSP/TOP define how often they calculate a value, what provisions should exist to address those times when technical issues prevent one calculation iteration to be completed? Referring to existing language regarding 175 hours for hourly.
Individual
Jonathan Appelbaum
The Uited Illuminating Company
Yes
The informal team has not provided a reliability related justification for this standard as it would apply to ISO-NE. TTC and ATC are utilized for tariff and commercial reasons. The existing MOD standards are administrative and a diversion of compliance monitoring resources. The proposed MOD standard reduces the requirements but is still commercial, administrative and a diversion of resources. Order 729 was issued in Nov 2009. ISO markets and procedures were developing and there was great concern of the transparency of the calculation to provide access to alternative enrgy sources. The processes and procedures surrounding the planning and operation of the transmission system in ISO-NE has matured and are now significantly different. Transmisison is allocated in a robust market environment. The process of allocating transmission to energy providors is performed in a market not in an operations planning environment. There is enough a difference to warrant a fresh look at the relevance of the concept of TTC and ATC as applied to ISO-NE.
Yes
This standard is not needed for reliability in ISO markets in the Northeast. Transmission systems are operated to and dispatched to SOL and IROL. The use of TTC and ATC is being forced onto the ISO and its members for reasons of national consistency and not reliability.
The Standard should be written to exempt ISO-NE and its members.This will allow an auditor to focus on items that impact adequate reliability and not on a commercial process.
Individual
Rich Salgo
NV Energy
No
No
Some concern with the use of distribution factors in R1, 1.3. This appears to state that as long as the PTDF or OTDF on another Transmisison Operator's system from the assessed system is 5% or lower, the Transmission Operator can ignore the impacts on that adjacent system. This seems to imply that a TTC value can be established which demonstrates an overload in an adjacent system, but as long as the DF's associated with the study contingencies are lower than 5%, these overloads can be disregarded.
Individual
Mark Westendorf
MISO

R 1.3.1 should indicate the “five percent or less” is an upper limit and read as follows: “The Transmission Operator shall use a distribution factor (Power Transfer Distribution Factor (PTDF) or Outage Transfer Distribution Factor (OTDF) cutoff value of five percent or less when determining if these constraints should be monitored.” Additional comments to Requirements: R1. 1. Is this intended to require a separate document to be posted on OASIS? 2. Section should be broken down into SOL section for internal and external entities. This aligns with TFC and TTC definitions. Then a second section should state that “TOP should specify assumptions used to build its powerflow models that support TTC or ATC calculations” 3. If entities already have NERC standard about SOL, shouldn’t the requirement just be that entity follows its SOL methodology internally and language about consideration for external SOLs? 4. Unclear what requirements need to be included in R1 vs what should be inside ATCID for R2. Many items included in existing ATCID documents seem like they would be moved to a new TTC ID document. 5. Regarding R.1.3.1, language should be edited to reflect a distribution cutoff for inclusion of a constraint. R2. 1. Not clear what information needs to be required in an ATCID document. 2. Suggest some language around periodicity of updates for ATC calculation similar to language in 1.4. R3: 1. Have concern with wording of requirement referencing the EEA2. Does EOP-002 R9 address this language? 2. MISO supports the application of CBM and TRM requirements to the Operations Planning time horizon. 3. Suggest language asking TSPs to state frequency of updates for CBM within their CBMID R4: 1. Suggest adding language from M1 into M4 when TOP and TSP are the same entity. R6: 1. Suggest revising language to indicate TSP or TOP should provide a response within 30 days that specifies a good faith estimate of a date when data can be shared. This is especially true for companies that utilize heavily automated systems on a hourly basis. Much work has to be done to establish file sharing protocols. General: 1. What is the rationale for requesting 5 year retention on methodology documents? 2. Request greater clarification on the second sub bullet of Evidence retention Sec. 1.2. What is by “calculations and other components of implementation” and for the most recent 14 days, etc. What is meant by the word “values”? ATC, TFC, TTC? 3. Regarding frequency of AFC, ATC calculations, if TSP/TOP define how often they calculate a value, what provisions should exist to address times where technical issues prevent one calculation iteration to be completed? Referring to existing language regarding 175 hours for hourly.
Group
Sacramento Municipal Utility District & Balancing Authority Northern California
Joe Tarantino
Yes
SMUD continues to maintain that the ATC MOD standards are not reliability driven. The Available Transmission Capacity and the calculations of associated Total Transfer Capability, Capacity Benefit Margin and Transmission Reliability Margin would be more appropriately incorporated into NAESB Standards. Exisiting standards address Steady-State, Voltage and Transient Stability limitations that adequately define acceptable operating boundaries.
No
SMUD agrees with the SDT’s approach that allows the entity to determine potential need for TRM or CBM. However, when an entity chooses not to use CBM or TRM, requiring that entity to maintain a CBMID or TRMID document to state that the TSP does not use CBM/TRM is an administrative burden that provides no reliability benefit. SMUD also supports limiting applicability to only the TSP for calculation of ATC or TTC and related functions. A TOP that doesn’t own transmission, and is not a TSP or doesn’t offer transmission service should not be required to calculate ATC functions.
Individual
Jim Howard
Lakeland Electric
No
No

1. With the proposed standard and its functional applicability, the TOP is responsible for TRMID and TTC methodology and the TSP is responsible for CBMID and ATCID: a. Shouldn't R5.2.1 be R5.3.2 and vice versa? b. For clarifications purposes, suggest modifying R1.3 to "The methodologies ….used in THE REQUESTING Transmission Operator's TFC or TTC calculation." 2. The drafting team has done a great job with consolidating the existing MOD-001, MOD-004, MOD-008, MOD-028, MOD-029 and MOD-030 standards into one standard. LAK agrees with the approach the drafting team has taken with the pro forma standard. However, LAK, in partial agreement with FMPA's concern, thinks that the TSP, not TOP, should be responsible for the calculation of TTC along with the calculation of ATC and CBM. While LAK believes that the TSP should be responsible for calculating both TTC/TFC and ATC/AFC, the TSP shall coordinate with the TOPs to appropriately account for certain elements (i.e. those listed under R1.2) of the TTC/TFC calculation. Therefore, LAK recommends that the drafting team changes the responsible party for the TTC calculation/methodology requirements from the TOP to the TSP with an additional sub requirement that certain elements (i.e. SOL/IROLs, facility ratings, load forecast, generation dispatch, etc.) affecting TTC calculation be provided by the appropriate TOPs to the TSP.
Individual
Chris de Graffenried
Consolidated Edison Co. of NY, Inc.
Agree
Northeast Power Coordinating Council (NPCC) region-wide group comments
Individual
Richard Vine
California Independent System Operator
No
The California ISO has submitted comments in coordination with the ISO/RTO Council (SRC) for this project.
No
The California ISO has submitted comments in coordination with the ISO/RTO Council (SRC) for this project. In addition the California ISO has the following comment: CAISO agrees that TTC calculation is a reliability issue while ATC calculation (and its formula) is more of a commercial issue based on each TSP approved Tariff. The effort to streamline the MOD-28,29, and 30 is very beneficial. The SDT should ensure that only the reliability-related requirements are being carried forward in the new MOD-001-2. All the commercial aspect of ATC calculation should be put under NAESB. With regards to R1.1. it states that the Methodologies shall include "What criteria (if any) is used to select which of the limits, or System Operating Limits (SOLs), are relevant to the calculation;" We believe that TTC calculation should respect and meet criteria including SOLs, but it needs to be clear that TTC does not have to be less than or equal to SOL (as currently stated in MOD-029 R3) because there is not always a one-to-one correlation between a TTC and SOL.
Group
ACES Standards Collaborators
Ben Engelby
Yes
(1) We are concerned that the informal development process that was originally contemplated has gone off course. The original plan was to have an informal development team create a proposal for a standard, who would then pass the work to a formal standard drafting team to continue the development process. This is not what has occurred. The informal development team should not have been appointed as the formal standard drafting team without soliciting nominations, as this creates the perception of NERC not following the standards development process. The informal development process should not circumvent the NERC Rules of Procedure. (2) We question the value in posting the draft standard with the SAR. What good is the SAR posting if a standard has already been developed?

This gives the impression that the Standards Committee has already determined the need for the standard and that stakeholders have no opportunity to influence the scope contained in the SAR contrary to the standards development process. It seems unnecessary to comment on the SAR at this point because it appears that it was drafted in tandem with the pro forma standard. We urge NERC to pay close attention to its Rules of Procedure and the Standard Process Manual to avoid deviations and setting precedent that could be challenged in the future. While we agree in principle with the consolidation of the numerous requirements in this project, the Standards Process Manual still must be followed.

No

(1) We remain unconvinced that there is a need for a standard on TFC, TTC, AFC, ATC, TRM and CBM. AFC and ATC are estimates on how much transmission service is remaining in the system based on projected system conditions at the time. Transmission service does not result in any flow on the transmission system but only represents a right to use the system. It is constantly changing because it is heavily dependent transmission topology, generator location and output level, and system load. It can change drastically when transmission lines or generators trips. Furthermore, it is based off an educated guess of which generators will supply the MWs utilizing the available capability. The bottom line is that it is based on assumptions that never exactly in real-time operations. Therefore, there is one certainty about AFC and ATC. The valued calculated will not match the real capability in real-time. As a result, system operators do not consider these values in any shape or form in preparing for the transmission system operation. TFC and TTC are redundant with FAC-013 which requires the calculation of transfer capabilities. TRM and CBM are essentially intended to ensure that the TSP does not sell the rights to use the transmission system beyond the capabilities of the transmission system to serve native load and network customers. It, however, does not represent actual use and deals only with property rights and, thus, is essentially a commercial issue. System operators can still implement emergency energy schedules and other emergency measures to serve load if necessary. Furthermore, TOP-002 R6 already requires the TOP to operate the transmission system to meet unscheduled changes in system configuration and generation dispatch (at a minimum N-1 Contingency Planning) and TOP-002 R10 requires the TOP to meet all SOLs and IROLs. These standards take into account contingency planning by the TOP, so generation is continuously adjusted to be able to survive the next contingency. Further, several TSPs have determined that there is no reliability need for CBM or TRM in its area and have elected to adjust the settingsto zero. Given all of these reasons, we do not see the need to for a standard on TFC, TTC, AFC, ATC, TRM and CBM to support reliability. (2) We disagree with R1 applying to the TOP. Traditionally, it is the TSP that would calculate the transfer capability to be consistent with the NERC functional model. (3) The purpose statement of the standard needs to be refined. Having three different purposes for a single standard is confusing. We recommend reducing the purpose to be more focused and succinct. Further, the purpose statements demonstrate the very nature of this standard is focused on commercial issues. Disclosure and transparency are commercial issues that are better suited as business practices, not reliability concerns. (4) Requirement R1 creates unnecessary compliance burdens as currently written. The phrase “prepare, keep current, and implement” is ambiguous and could be interpreted in multiple ways. First, the term “prepare” does not accurately describe the action of designing or developing a methodology for calculating TFC or TTC. “Prepare” infers preliminary work prior to actual development. We recommend replacing “prepare” with the word “develop.” Second, the term “keep current” is subjective and could be interpreted differently by regional compliance auditors. Whether a document is “current” depends on a variety of factors and is subjective. Considering that an audit is a backward looking event that could span several years, the evidence for a particular time period may not be the most current version. We recommend striking the “keep current” clause because it causes unnecessary confusion. Finally, the word “implement” requires additional evidence that goes beyond the scope of the requirement. There are numerous reliability standards that contain the word “implement” and state that the evidence to prove compliance would be through training. We do not believe that the drafting team intends to have training be a part of this standard. If the methodology describes how to calculate TFC or TTC, and the calculations match the methodology, then there is evidence that the methodology was implemented. The requirement stands on its own without the word “implement.” We recommend striking the word “implement” because the regional compliance auditors may ask for additional evidence, such as training records, which is not the intent of this requirement. (5) Requirement R1, Part 1.1 and Part 1.2. The structure of the standard needs to be

revised, as the bullets generally mean “or” but these lists of elements, criteria, descriptions, and rationale are all required (i.e., “and”). The bullets should be changed to sub-parts (e.g., 1.1.1, 1.1.2, and so on) if each action is required. The current structure deviates from the structure of reliability standards and should be revised accordingly. (6) Requirement R1, Part 1.2. We have concerns with the elements that are required for the TFC or TTC calculation. The second bullet and the seventh bullet require the inclusion of “additions and retirements.” There is no need to have the phrase “including, but not limited to, additions and retirements.” Because transmission topology should reflect the topology for the target period of the calculation, inclusion of the phrase “additions and retirements” is redundant and only leads to confusion. If TFC or TTC is calculated for 13 months out, the transmission topology should reflect the expectations of that time period and failure to remove a retired line would not reflect the transmission topology accurately. If there is an addition to the transmission topology, then it would be included as an existing transmission element, and if there is a retirement, then you would not need to account for it. Further, what additional factors does the drafting team want to be considered? The phrase “including but not limited to” infers an non-exhaustive list. If there are other specific factors, list them in the standard. The issue is similar for the seventh bullet requiring “additions and retirements” of Generator Dispatch. These bullets could be worded better to avoid any misunderstandings. Part 1.2 already contains specific elements for the calculation, so there is no need to leave industry guessing as to other criteria that should be included. This bullet is problematic and we recommending striking all language after “Transmission topology” and after “Generator dispatch.” (7) Requirement R1, Part 1.2. We have concerns with the third bullet and the inclusion of “projected” transmission uses. What does the SDT mean by currently approved and projected transmission uses? Is this network service, native load, and confirm point-to-point transmission reservations? Is it requested transmission service? Is it approved transmission service that has yet to be confirmed by the customer? This is not clear and needs further refinement. (8) Requirement R1, Part 1.3. We have concerns with the phrase “another Transmission Operator.” The word “another” should be replaced with “applicable” or “adjacent” or “neighboring.” Also, What does “shall include” mean? How does one include a constraint in a methodology? Shouldn’t it state how the TOP will address constraints requested by another TOP? This might give the TOP flexibility to decide if it is “neighboring”, “adjacent” or something more specific. Further refinement is needed to properly convey the drafting team’s intent. (9) Requirement R1, Part 1.4. While we appreciate the flexibility that the drafting team provided in the current wording, allowing the TOP to provide updated values to the TSP, we find this requirement administrative in nature and unnecessary. Paragraph 81 applies because this requirement fits the following criteria: it is administrative in nature, is purely documentation or reporting, requires periodic updates, and has little, if any, value as a reliability requirement. We recommend striking Part 1.4 in its entirety. (10) Requirements R2, R3 and R4. As stated above, we disagree with the language “prepare, keep current, and implement.” We recommend replacing this phrase with “develop” for the reasons previously stated. (11) Requirements R5 and R6. These requirements are administrative in nature and unnecessary. Paragraph 81 applies because these requirements fit the following criteria: they are administrative in nature, purely documentation or reporting, require periodic updates, and have little, if any, value as reliability requirements. We recommend striking Requirements R5 and R6 in their entirety. (12) Compliance Section, Part 1.2 Evidence Retention. The TOP is on an audit cycle of three years. Therefore, it should only be required to retain documentation for its audit cycle. We request that the drafting team consider reducing the time period to align with the practical application of an audit cycle. The regional entity will retain the data from the previous audit and there is not a need for the registered entity to also retain the documents. We continue to believe that the data retention period is too long and may cover time periods that are no longer relevant. There is nothing that requires the drafting team to use this language requiring the data retention period to match the audit period. In contradiction, section 3.1.4.2 of Appendix 4C- Compliance Monitoring and Enforcement Program of the NERC Rules of Procedure is very clear that reliability standards may have a data retention period that is less than the audit period. Furthermore, countless standards use other data retention periods where it makes sense. For example, TOP-003-2 uses 90 days for one of the requirements based on the sheer volume of the data. The bottom line question should be: “Does a five year data retention period and the associated resources dedicating to maintaining this data for that long support reliability?” The answer is no and, thus, it should be changed. (13) VRF and VSL Table. We disagree with the categorization of R2, R3 and R4. As stated above, the drafting team should revise the requirements to remove “prepare, keep current, and implement” and replace it with the word “develop.” The current VSLs should not be measured based on these subjective thresholds that require three separate actions

within a single requirement. We also disagree with the inclusion of Requirements R5 and R6 in the standard as they are administrative in nature and meet Paragraph 81 criteria. As stated above, we recommend striking R5 and R6 in their entirety. (14) Thank you for the opportunity to comment.
Individual
Anthony Jablonski
ReliabilityFirst
Yes
ReliabilityFirst believes the draft MOD-001-2 standard is still too locked into AFC, ATC, TFC, TTC, CBM, or TRM being the only way to communicate availability of transmission service to the market. ReliabilityFirst recommends changing the title to state: “Communicating Available Transmission System Capability to the Markets” and making adjustments throughout the standard that permit other communications of transmission service availability to be developed.
ReliabilityFirst votes in the affirmative because the modifications to this standard further enhances reliability by addressing the FERC directives, paragraph 81 candidates, and making the requirements more results based while consolidating the MOD A standards (MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030) into a single standard covering the reliability-related impact of ATC and AFC calculations. ReliabilityFirst offers the following comment for consideration: The proposal lacks any measurement of whether the communication of availability of transmission service is accurate. Checking that the calculations conform to a methodology does not assure accuracy. ReliabilityFirst believes the addition of a requirement to verify that past communications of service availability were accurate would be an improvement. Since these values are predictive, and cannot be 100% accurate, there needs to be some measure of the quality of communication or even that it was satisfactory. For consideration, ReliabilityFirst recommends a requirement for periodic analysis of the accuracy of the communication of transmission service availability, as it relates to the use of LMP, TLR, Reactive Interfaces and other local line loading relief procedures.
Group
Duke Energy
Colby Bellville
Yes
In the SAR, the objectives of the proposed standard’s requirements included, address outstanding directives from FERC Order 729, remove market based requirements, and incorporate lessons learned. Duke Energy requests clarification on which lessons learned are being incorporated. Also, Duke Energy requests clarification on what aspects of this project will be transferred over to NAESB. We are unclear as to what coordination will take place with NAESB.
Yes
Duke Energy has concerns that the prescribed method for the calculation of Transfer Capabilities that is present in the currently effective standard, has not been carried over into the proposed version of MOD-001-2. Duke Energy understands that the proposed standard allows for more flexibility to the entity in its Transfer Capability calculations which is favorable. However, we would suggest that the Drafting Team consider inserting the equation for calculating the ATC into the standard to promote some consistency between entities. Also, we feel that there needs to be some additional language or another requirement to mimic the intent of Requirement 5.3 of the current MOD-030 standard. R 1.3 requires that we include requested flowgates from neighboring areas but there is no language like R 5.3 of the current MOD-030 that requires the use of the calculated values of the owning company for those flowgates. This ensures that the company that has the best available information as far as the equipment capabilities and impacts is captured in everyone’s use of that flowgate for calculating transfer capabilities. This ensures that any limits reported in the AFC/ATC process still respect that facilities’ owner’s reliability needs for that equipment by respecting TRM and CBM. We feel this echoes FERC’s intention as stated in paragraph 123 of FERC Order 890 which states: “This lack of communication and coordination between transmission providers of ATC data can also affect reliability. As discussed above, a transmission provider could grant transmission service without being aware of the real impact that service may have on an adjacent transmission provider’s system, thus

degrading the reliability of the interconnected system. Inaccurate ATC values can cause overselling of transfer capability, which can lead to curtailments or transmission loading relief (TLR) actions to avoid exceeding thermal, voltage, and/or stability limits." We also feel that there needs to be language that includes the intent of R2.1.3. of the current MOD-30 standard. If a facility in an entity's Reliability Coordinator's Area has been subjected to an Interconnection-wide congestion management procedure within the last 12 months and is not captured in the initial flowgate screening, it should be included in the flowgate list. By requiring the Interconnection-wide congestion management process, the limiting Element/Contingency has shown susceptibility to transmission impacts and should be included in the calculation of ATC.
R1: Duke Energy suggests the rewording of Requirement 1 to read: "Each Transmission Operator shall prepare, keep current, and implement a methodology for calculating its TFC or TTC, if:" R2: Duke Energy suggests that the drafting team should consider inserting the equation used for the calculation of Firm and non-Firm ATC. Also, we suggest that the elements identified in R1.2, should be included in R2 as well. R5: Duke Energy suggests that the Drafting Team consider implementing a mechanism where an entity can reconcile differences with a neighboring entity in their calculation of ATC/AFC and TTC/TFC. A neighboring entity's calculation of ATC/AFC and TTC/TFC has the potential to negatively impact an entity's operation. R6: Duke Energy suggests that R6.1 be reworded to state, "To be valid, the request must specify the data and frequency for use in the requesting party's AFC, ATC, TFC, or TTC calculations." We feel this change would illustrate whether or not a data request was a one time data request, or an whether an ongoing data sharing has been established.
Individual
Bill Temple
Northeast Utilities
Not in Support of the Ballot. The requirements are administrative in nature and do not support reliability. They also seem like they would fall under Paragraph 81 criteria.
No
No
Individual
Angela P Gaines
Portland General Electric Co
Yes
PGE thanks the drafting team for the opportunity to comment on the proposed standard. As described in the SAR the scope is to condense MOD-001, -004, -008, -028, -029 and -030 into a single standard that covers the reliability-related impact of Available Transfer Capability (ATC) and Available Flowgate Capability (AFC) calculations. The consolidation of these standards into one MOD-001-2 as written does not reorient focus on the reliability-related aspects of the standards as intended. MOD-001-2 weakens coordination between neighboring utilities by failing to provide any guidance for the proper calculation and definitions of TFC and TTC outside of the MOD-029 -030 standards that will be retired through this project. MOD-001-2 refers several places to "TFC or TTC Methodology"
Yes
MOD-001, -004, -008, -028, -029 and -030 considered many details of the different aspects of determining transfer capability. Consolidating these MOD's into this single standard loses most of the guidance being provided by NERC that was depended on by the registered entities. If there are other guidance documents NERC has provided in the past they should be explicitly referenced within the new standard. MOD_A leaves the development of the methodology up to the Planning Coordinator to develop and there is no longer any aspect of coordination between adjacent entities.
MOD_A should refine requirements from the individual standards and NERC should continue to provide the guidance which is central to the reliability need for the calculation of ATC, TFC and TTC.
Individual
Sergio Banuelos

Tri-State Generation and Transmission, Inc.
No
No
In regards to R1, the "TTC methodology" needs to remain singular throughout the requirement, rather than the inconsistent use of the plural "methodologies". The plural use seems to indicate that each TOP may need to present multiple methodologies for the determination of path TTCs, rather than the one intended over-arching TOP TTC Methodology (similar to the ATCID, for instance). The singular "methodology" should be the consistent term throughout the requirement to avoid any confusion.
Individual
RoLynda Shumpert
South Carolina Electric and Gas
Agree
SERC PSS
Group
Tennessee Valley Authority
Dennis Chastain
SERC Planning Standards Subcommittee (PSS)
Yes
TVA believes that the standards could split the required tasks between the TOp and the TSP in a way that makes more sense and is more applicable to the tasks that TOps and TSPs are normally responsible for. For example, it makes sense that the TOp be responsible for facility ratings and SOLs that are used in the calculation of transfer capability. It makes sense that the method used to calculate transfer capability and the inputs into the calculation, such as TRM, are the responsibility of the TSP. There are numerous small TOps that don't have an associated TSP. The standards as presently written don't normally apply to those smaller TOps. If the calculation of transfer capability and the inputs into the transfer capability calculation process (other than SOLs and IROLs) were moved to the TSPs this would remove a current source of confusion for these smaller TOps that aren't required to calculate transfer capability but have applicable requirements under the MOD standards.
Yes
TVA agrees with the goal of the Standard Drafting Team to decrease the number of requirements and make the standards less confusing and less onerous. Given these goals, it is important that the standards still ensure a relatively consistent and reliable calculation of transfer capability. TVA feels the accurate calculation of transfer capability is a reliability issue. It is the job of the operations planners to give the operators a system that was planned to be reliable. If the operators are given a system that has numerous n-1 overloads planned into the system, then the operational planning engineers did not do their job. We do not want our operators to intentionally have to handle numerous TLRs and generation re-dispatch because of an oversold system. If the TOp and TSP oversell the system too much, it may be difficult for the operators to maintain system reliability. A transmission system constantly in TLR3 and TLR5 due to inaccurate calculations of transfer capability is a reliability issue and not just a commercial issue. If your neighbor is constantly selling transfer capability and ignoring the impact on your system, this too will affect your reliability. It is important that the MOD standards ensure that the calculation of transfer capability is done accurately such that the TOp and TSP are not causing reliability issues on their own system and their neighboring systems. The language in 1.3.1 as written is confusing. It needs to be defined how the PTDFs and OTDFs are calculated. It's assumed that the drafting team means a generation to load impact, if so it needs to be stated as such. The drafting team should also be careful with using the value TTC. It has many different meanings depending on what transfer capability calculation methodology is used. TTC is normally a useless value without much direct relationship to the system. The problem lies in the fact that in order to calculate TTC there must be some reservation assumptions included in the model to begin with. What assumptions are included can change what the TTC value is. A more important value

that does relate to the reliability of the system is ATC. We think the standards should revolve around the calculation of ATC and the accurate calculation of ATC. All three methodologies use ATC and have the same relative definition of ATC. ATC also has a direct relationship to the reliability of the system.
Group
Colorado Springs Utilities
Kaleb Brimhall
Florida Municipal Power Agency (FMPA)
No
Yes
• Please clarify PTDF and OTDF 5% threshold value in R1.3.1 to ensure it meets the intention of MOD-030-2.
• TTC must not be considered the real-time SOL or IROL (TTC and SOL/IROL are completely different flows , scheduled versus actual). TOP should honor SOL and IROLs not TTC or TRC.
Group
SPP Standards Review Group
Robert Rhodes
No
R1.2 of MOD-029-1a was omitted in the Mapping Document.
We thank the ad hoc team for their effort in reviewing and proposing a consolidated standard covering the ATC process. The resulting product provides a solid basis for further work in this area. Thanks to the team. We support the justification offered by the Florida Municipal Power Agency proposing to change the responsibility of TTC/TFC and TRM calculation requirements from Transmission Operators (TOPs) to Transmission Services Providers (TSPs). Therefore, we suggest the following changes: • From the Applicability section remove 4.1.1 Transmission Operator. • R1, change the responsibility from the TOP to the TSP. We recognize that this change would also require conforming changes to the NERC Functional Reliability Model responsibilities of the TOP and TSP. The NERC Reliability Functional Model states that the TTC/TFC calculation is the responsibility of the TOP. • R4, change the responsibility from the TOP to the TSP. We're also proposing conforming changes to the TRMID definition in the NERC Glossary of Terms. The approved TRMID definition (below) in the NERC Glossary of Terms indicates that TRM calculation is the responsibility of the TOP. The TRMID definition should change from "…Transmission Operator's calculation of TRM" to "…Transmission Services Provider's calculation of TRM." TRMID (NERC Glossary of Terms): A document that describes the implementation of a Transmission Reliability Margin methodology, and provides information related to a Transmission Operator's calculation of TRM. • R5, change the responsibilities to refer only to the Transmission Service Provider (TSP). In the VSLs for R1 the phrase 'one of the requirement parts' is used extensively. It is not clear whether this refers to R1.1 in totality or to any one of the bulleted items under R1.1. Can the drafting team please clarify? 'Real time' in the Rationale Box for R2 needs to be changed to 'Real-time' to be consistent with the Glossary of Terms.
Group
Associated Electric Cooperative, Inc. - JRO00088
David Dockery
No
We appreciate this effort to answer FERC Order 729, while seeking to determine the proper balance between reliability, commercial, and compliance risks.
No
So long as R1.3 includes honoring a flowgate TOP TSP's AFCs, when requested by that neighboring TOP or its TSP, AECI believes this MOD-001-2 captures the overall intent.

We question the need for other than TSPs to be applicable to this Standard, where TOPs should be proactive but not required to utilize provisions and transparency drafted herein. We agree this Applicability issue, raised by other's comments, requires careful consideration, to avoid unnecessarily burdening unrelated entities.
Group
Western Electricity Coordinating Council
Steve Rueckert
No
WECC questions the need for the standard at all. WECC voted to approve the standard becasue it is an improvement over the existing standards. However, TTC/TFC and TRM are commercial values that may be indicative of reliability limits, but are strictly commercial in nature. RCs and TOPs are not required to operate with TTC limits, but rather within SOLs and IROLs. The long term goal should be to retire this standard in its entirety but this first step is an improvement over the currently effective standards.
Individual
Donald E Nelson
Commonwealth of MA Dept. of Public Utilities
Agree
I support the comments of NPCC.
Group
Southern Company: Southern Company Services, Inc.; Alabama Power Company; Georgia Power Company; Gulf Power Company; Mississippi Power Company; Southern Company Generation; Southern Company Generation and Energy Marketing
Pamela Hunter
Yes
In R5 it states “or any other registered entity that demonstrates a reliability need”. FERC in its ORDER 729 para 151 states that the reliability needs to be demonstated to the ERO. May need to make this clearer in the requirement. R5 5.1 needs to be removed or made to be consistence with 5.2 and 5.3 R3 states “Each Transmission Service Provider shall prepare, keep current, and implement a Capacity Benefit Margin Implementation Document (CBMID) that describes its method for establishing margins to protect system reliability during a declared NERC Energy Emergency Alert 2 or higher. Transmission Service Providers that do not use Capacity Benefit Margin (CBM) shall state this in the CBMID.” A better wording of this standard would be “Each Transmission Service Provider that maintains a CBM shall prepare, keep current, and implement a Capacity Benefit Margin Implementation Document (CBMID) that describes its method for establishing margins to protect system reliability during a declared NERC Energy Emergency Alert 2 or higher.” Taking out the last sentence which is already stated in NAESB standards will eliminate the risk of double jeopardy. R4 states “Each Transmission Operator shall prepare, keep current, and implement a Transmission Reliability Margin Implementation Document (TRMID) that describes its method for establishing margins to protect system reliability. Transmission Operators that do not use Transmission Reliability Margin (TRM) shall state this in the TRMID.” A better wording of this standard would be “Each Transmission Operator that maintains a TRM shall prepare, keep current, and implement a Transmission Reliability Margin Implementation Document (TRMID) that describes its method for establishing margins to protect system reliability.” Taking out the last sentence which is already stated in NAESB standards will eliminate the risk of double jeopardy.
No
In R1 does this mean a TSP can request a TOP to prepare, keep current, and implement a TTC methodology? In M1-M4 there is no requirement to make it available, just to prepare it, keep it

current, and implement it. If no requirement to make it available, the measure should only be "A dated effective methodology". The "M" should say "A dated methodology that addresses, at a minimum, the elements required in R1 and subparts." In R2 since TTC is a component of ATC, would it be acceptable for a TSP to refer to the TOP's TTC Method in its ATCID?

Additional Comments Received:

Portland General Electric Co.

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:

As described in the SAR the scope is to condense MOD-001, -004, -008, -028, -029 and -030 into a single standard that covers the reliability-related impact of Available Transfer Capability (ATC) and Available Flowgate Capability (AFC) calculations. The consolidation of these standards into one MOD-001-2 as written in the SAR does not reorient focus on the reliability-related aspects of the standards as intended. MOD-001-2 weakens coordination between neighboring utilities by failing to provide sufficient guidance for the proper calculation and definitions of TFC and TTC outside of the MOD-029 -030 standards that will be retired through this project. A consistent methodology would no longer exist in a controlled document as it does today with the current MOD's. NERC guidance will be even more important when adjacent utilities use differing methodologies and calculate differing values at interconnection points.

2. Are there any specific elements from the original MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, or MOD-030 that you believe are critical to reliability that have not been retained? Please explain.

☒ Yes

☐ No

Comments:

Portland General Electric supports NERC's effort to consolidate duplicative and overlapping reliability standards, including MOD-001, -004, -008, -028, -029 and -030 which consider many details of the different aspects for determining transfer capability. However, consolidating these MOD's into this single standard loses most of the guidance being provided by NERC that was depended on by the registered entities. MOD_A leaves the development of the methodology up to the Planning Coordinator to develop and there is no longer any aspect of coordination between adjacent entities.

3. Please specify if you have comments or proposed changes to any of the Requirements of the pro forma standard.

Comments: MOD_A should refine requirements from the individual standards and NERC should continue to provide the guidance which is central to the reliability need for the calculation of ATC, TFC and TTC. PGE suggest that NERC point entities to the guidance documents NERC has provided such as "Transmission Transfer Capability, May 1995" should be explicitly referenced as standard methodology within the new standard