

Summary Consideration of Comments:

The Drafting Team has reviewed the comments and made some changes to the standard to address these comments.

1. The Drafting Team changed the language to specify the TRM be “established” instead of “calculated” in requirement 4 and all subsequent references to the number.
2. The drafting team removed the requirement that the assumptions used in Transmission Reliability Margin studies be consistent with those used in “associated” operations or planning studies. Studies used for TRM are based on non-standard scenarios, and would be inappropriate to make consistent with “normal” studies.
3. All VRFs were set to “Lower” in response to industry comments. A medium risk factor is appropriate for “a requirement that, if violated, could *directly* affect the electrical state or the capability of the bulk power system, or the ability to effectively monitor and control the bulk power system, but is unlikely to lead to bulk power system instability, separation, or cascading failures.” A violation of these standards can produce values that indirectly affect the system (i.e., the value may be used in other processes that result in the sale of transmission service), which results in a Lower VRF. The Drafting Team believes that subsequent recalculations of ATC or AFC will help address any incorrect values. Additionally, such a value would be identified and prevented in advance of actual reliability problems by other standards (e.g., SOL or IROL in the FAC standards) as well as the Transmission Operator’s existing guidelines and procedures that prevent the Transmission Operator from over-scheduling.
4. A more graded approach was applied to the VSLs where appropriate.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Gerry Adamski at 609-452-8060 or at gerry.adamski@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

¹ The appeals process is in the Reliability Standards Development Procedure:
<http://www.nerc.com/standards/newstandardsprocess.html>.

Consideration of Comments on Initial Ballot of MOD-008

Entity	Comment
Associated Electric Cooperative, Inc.	AECI does not understand why there can not be an option to continue to use the conservative 5% option that the NERC white paper dated 7/14/1999 suggest is reasonable. It takes a lot of effort to provide the document being requested for TRM. If we are currently using the rule of thumb method (i.e. 5%) this should be and option. If an entity want to go less than 5% the entity should provide all the basis for the justification as noted in the standard. The VSLs are also high.
<p>Response: The standard does allow the use of 5%, but requires an explanation of what the percentage represents. In addition the Drafting Team added language to Requirement 3 to be clear that entities only have to provide information that was used, not create information to support a request. Members of the Drafting Team reviewed the white paper referenced and other resources and do not, at this time, have sufficient technical information to establish a default or recommended TRM that would adequately balance reliability and market availability for all parts of North America.</p> <p>The Drafting Team has redrafted the VSLs to include more gradation criteria</p>	
CenterPoint Energy	ERCOT's filed comments to the SDT that ATC, TTC, CBM, and TRM are not applicable within ERCOT operations and that these Standards should have provisions that make it clear that these requirements apply only within market structures in which they are pertinent were ignored by the SDT. These standards should not apply to ERCOT, thus our negative vote.
<p>MOD-008 only applies to Transmission Operators that maintain TRM.</p>	
FirstEnergy Energy Delivery	<p>FirstEnergy Corp. (FE) appreciates the hard work put forth by NERC's ATC Standard Drafting Team. We offer the following general comments in addition to our specific standard comments presented below.</p> <p>CBM & TRM - MARKET AREAS: FE supports the drafting team's approach of three ATC methodologies presented in MOD-028, MOD-029 and MOD-030 to account for differences in calculating ATC in various geographic areas of the bulk electric system. However, the use of a single standard methodology for CBM and TRM as currently written does not meet the needs for entities operating within a market area such as MISO, PJM etc.</p> <p>FE suggests that various requirements in the proposed standards that are currently applicable to the TP and TOP are actually handled by the RTO and within a market area would more appropriately be assigned to the Planning Coordinator (PC) and Reliability Coordinator (RC), respectively. This change would allow the proposed standards for CBM and TRM to be used largely "as is" within both market and non-market areas as the PC and RC would be appropriate in both.</p> <p>Our comments below on specific MOD standards elaborate on this point and provide examples where we feel the applicability is inappropriately assigned to TP or TOP responsible entities within a transmission market construct.</p> <p>DECISION TO BALLOT: While the MOD standards presented are improving in content FE believes the standards should have been issued for one more comment period prior to ballot per the NERC Standard Development Procedures (SDP). In many cases this is only the 2nd draft version being reviewed by industry. The objective during the "Solicit Public Comments on Draft Standard (Step 6)" of the NERC SDP is to "Receive stakeholder inputs on the draft standard for the purpose of assessing consensus on the draft standard, and modifying the draft standard as needed to improve consensus." Based on the 200+ pages of comments of the prior draft version it is hard to conclude that the industry was near consensus. Additionally, per the SDP, now that the standards have gone to First Ballot (Step 9), the standard drafting team is not permitted to make any changes to the standards based on comments received during this First Ballot. The drafting team will now be required to rely on their responses to industry feedback to try and improve consensus during a re-circulation ballot.</p>

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Entity	Comment
	<p>FE has concerns with the consequences of this decision with regard to the integrity of the standard development process and substantive registered entity perspectives. FirstEnergy Corp.</p> <p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p> <p>(FE) appreciates the hard work put forth by NERC's ATC Standard Drafting Team. However, at this time, FE is voting Negative to this standard with the following comments and suggestions:</p> <ul style="list-style-type: none"> - For utilities involved in market structures, the Transmission Service Provider (TSP) is ultimately responsible for calculating and assuring proper ATC for its footprint. Therefore in these instances it would not be appropriate that the Transmission Operator (TOP) be responsible for maintaining a TRMID. For example, in the MISO footprint, MISO maintains and implements a single TRMID for all of its member companies. The standard should reflect these alternative industry situations through either changes in the requirements or addition of market or regional variances specifically stated in the standard. - Additionally, per MOD-004 R1, the TSP is responsible for maintaining a CBMID, and then it should follow that the TSP and not the TOP would be responsible for maintaining a TRMID. <p>Response: In order for the standard to be audited one entity alone must be accountable for a requirement. In the case of TRM the team decided for two reasons to assign this to the Transmission Operator. The first reason was the Transmission Operator is the ultimate customer of this value since the Transmission Operator is the one who has deal with the results of the TRM selection. The second is that the Transmission Operator is the lowest entity in the hierarchy, and in some cases the Transmission Operator may not wish to relegate this authority to someone else, and by not assigning it to them the team would have limited their options in that regard. Ultimately the team believes that in cases where TRM is used, the Transmission Operator is responsible for either developing the TRM or insuring that it is developed. Nothing in the standard prevents the Transmission Operator from contracting the responsibility and accepting another parties TRMID and TRM values.</p>
<p>Response: Please see in-line responses.</p>	
Great River Energy	GRE agrees with the PJM and MISO recommendation that the standard needs an additional commenting period based on the significance of the comments submitted during the previous commenting periods.
<p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p>	
Hydro One Networks, Inc.	Hydro One Networks Inc. is casting a negative vote on the 6 MOD standards (MOD-001, MOD-004, MOD-008, MOD-28, MOD-029 and MOSD-030) We believe there is a fundamental issue related with effective dates, that is, the dates in which Reliability Standards become effective and enforceable. In principle, the effective date of standards must be the same for all jurisdictions in North America. It does not make sense that there is a period of time when a standard is effective only in some jurisdictions while not in others. This is particularly important in the MOD Standards in ballot as they have implications on neighbouring areas. The words inserted in the Effective Date of the Standards as well as in the Implementation Plan document permit that these Standards are effective in some jurisdictions and not others. These Standards should be modified to ensure that they become effective in all jurisdiction at the same time, including those where such regulatory

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Entity	Comment
	approval in not required that is, only when all regulatory approvals have been obtained,
<p>Response: The Drafting Team does not believe this standard must be implemented at the same time throughout North America.</p>	
Kansas City Power & Light Co.	Requirements state that the Transmission Operator is to perform functions that are currently performed by the SPP Transmission Service Provider for KCPL. Suggest revising requirements by adding "or Transmission Service Provider" after "Transmission Operator" so that either entity could perform these tasks.
<p>Response: In order for the standard to be audited one entity alone must be accountable for a requirement. In the case of TRM the team decided for two reasons to assign this to the Transmission Operator. The first reason was the Transmission Operator is the ultimate customer of this value since the Transmission Operator is the one who has deal with the results of the TRM selection. The second is that the Transmission Operator is the lowest entity in the hierarchy, and in some cases the Transmission Operator may not wish to relegate this authority to someone else, and by not assigning it to them the team would have limited their options in that regard. Ultimately the team believes that in cases where TRM is used, the Transmission Operator is responsible for either developing the TRM or insuring that it is developed. Nothing in the standard prevents the Transmission Operator from contracting the responsibility and accepting another parties TRMID and TRM values.</p>	
Potomac Electric Power Co.	<p>Potomac Electric agrees with the comments of PJM distributed to the ballot body. I will not repeat them here, but do include the headings:</p> <ul style="list-style-type: none"> I. The ATC MOD standards should have been sent out for comment not pre-ballot posting. II. Depth of the ATC MOD standards is excessive. III. Determining Violation Risk Factors is incorrect. I IV. Determining Violation Severity Levels is incomplete.
<p>Response: Please see response to PJM.</p>	
Public Service Electric and Gas Co.	PSE&G votes NO for the reasons expressed in PJM's comments.
<p>Response: Please see response to PJM.</p>	
Southern Company Services, Inc.	We applaud the great work of the standard drafting team. While the current version is "workable" by Industry, making minor changes to the current draft could undermine the integrity of the good work of the drafting team.
<p>Response: Thank you for your support. However, based on industry response, the drafting team has made modifications to the standard and is reposting for another comment period.</p>	
Westar Energy	Should also apply to Transmission Planners and Planning Authorities
<p>Response: The TRM value is developed by the Transmission Operator so there are no requirements placed on the Transmission Planner or Planning Coordinator, and therefore they are not listed in the applicability section. As part of the review regarding your comment, the Drafting Team removed the Transmission Service Provider since they no longer have requirements under MOD 008. The team extensively discussed</p>	

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	<p>adding a new requirement addressing the Transmission Planner and Planning Coordinator; however the drafting team determined that they could not draft language to tie the TRM to operational and planning studies without essentially creating another planning or operational planning standard in addition to the existing one. From a reliability perspective, if the entity is meeting the operational and planning requirements then they are by definition planning a reliable system regardless of their inclusion or exclusion of TRM from those studies. If an entity is using an overly restrictive TRM or using a TRM that is inconsistent with their planning practices this is a commercial or hoarding issue, and not a transmission reliability issue (which is the focus of NERC standards). Additionally, since TRM is based on studies that go beyond the "normal" operations of the system, the drafting team felt it would be inappropriate to require these "what if" scenarios to be limited by those studies used in normal operations planning.</p>
<p>New York Independent System Operator</p>	<p>The NYISO agrees with PJM that:</p> <ul style="list-style-type: none"> – the assumptions used in Transmission Reliability Margin studies need not necessarily be consistent with those used in "associated" operations or planning studies and that R1 should be modified accordingly (including to clarify what counts as an "associated" study; <p>Response: The drafting team has eliminated this requirement from the standard.</p> <ul style="list-style-type: none"> – R3 should allow a default percentage to be used without requiring underlying documentation, work papers, or load flow base cases if they are not used to determine that percentage; <p>Response: Nothing in the standard precludes the use of a percentage. Although the standard does require an explanation of what the percentage represents, it no longer explicitly requires any specific underlying documentation.</p> <ul style="list-style-type: none"> – revised requirements R4 and R5 are overly prescriptive, – establish TRM recalculation frequency requirements that should be left to NAESB, – and have been assigned an inappropriately severe violation risk factor that (Medium) that is not consistent with NERC's own rules on defining risk factors; and – revised R5's proposed violation severity levels that do not recognize that there may be differing level of non-compliance. – The NYISO is also concerned that revised requirement R4 would require TRM to be recalculated more frequently than necessary for Transmission Operators whose TRM assumptions do not change frequently. At a minimum, the NYISO requests that the SDT modify R4 in the same way that MOD-001 requirement R7 was revised, i.e., so that TRM need not be recalculated every 13 months to the extent that none of the underlying inputs change. <p>Response: The Drafting Team changed the language to specify "establishing" of the TRM values once every 13 months. The change to "establish" was made to emphasize that simply affirming the current value should continue to be used is sufficient for compliance. The Drafting Team believes that this is appropriate to be assigned to NERC. The team has moved all the violation risk factors to low, and has redrafted the VSLs to include more gradation criteria. The team has determined that if entities are using these values to allow transactions, then the ATC value (including its components such as TRM) is important to reliability.</p>
<p>Response: Please see in-line responses.</p>	

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<p>PJM Interconnection, L.L.C.</p>	<p>MOD-008 Specific Comments:</p> <p>PJM believes no requirement from the set of ATC standards should have an assigned Risk Factor exceeding "Lower". A Lower Risk Factor requirement is administrative in nature and</p> <ul style="list-style-type: none"> (a) is a requirement that, if violated, would not be expected to affect the electrical state or capability of the bulk power system, or the ability to effectively monitor and control the bulk power system; or (b) is a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to affect the electrical state or capability of the bulk power system, or the ability to effectively monitor, control, or restore the bulk power system. The ATC MOD standards should have been sent out for comment not pre-ballot posting. <p>Response: The Drafting Team in response to the industry comments has set the VRF's to lower for all requirements. A medium risk factor is appropriate for "a requirement that, if violated, could directly affect the electrical state or the capability of the bulk power system, or the ability to effectively monitor and control the bulk power system, but is unlikely to lead to bulk power system instability, separation, or cascading failures." A violation of these standards can produce values that indirectly affect the system (i.e., the value may be used in other processes that result in the sale of transmission service), which results in a Lower VRF. The Drafting Team believes that subsequent recalculations of ATC or AFC will help address any incorrect values. Additionally, such a value would be identified and prevented in advance of actual reliability problems by other standards (e.g., SOL or IROL in the FAC standards) as well as the Transmission Operator's existing guidelines and procedures that prevent the Transmission Operator from over-scheduling.</p> <p>Requirement 1</p> <ul style="list-style-type: none"> - R1.2 requires the use of assumptions consistent with those used in the Transmission planning process, while MOD-001 R6 requires the use of assumptions consistent with those used in associated operations studies or planning studies. This difference needs to be clarified and consistent among all the MOD standards where applicable. PJM believes that the language should be modified because there are many studies that are performed within the different Functions and can serve different purposes. Therefore, ATC calculations assumptions need not be consistent with this diverse array of studies. - The phrase "associated studies" can be ambiguous and subject to interpretation without more clarity. PJM proposes that TRM standards follow the same type exclusion as mentioned for MOD-001 R6: TRM assumptions need not be consistent with assumptions used in Transmission planning process not associated with calculating TTC, AFC, and ATC. <p>Response: The Drafting Team has eliminated R1.2.</p> <p>Requirement 3</p> <ul style="list-style-type: none"> - R3 should allow a default percentage to be used without requiring specific documentation, work papers and load flow cases if a straight percentage like 5% is used. Additional information would be required only if a greater

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	<p>amount is used. This requirement is burdensome for a component of ATC that should be easy to assess its reasonableness.</p> <p>Response: The standard does allow the use of 5%, but requires an explanation of what the percentage represents. In addition the Drafting Team added language to Requirement 3 to be clear that entities only have to provide information that was used, not create information to support a request. Members of the Drafting Team reviewed the white paper referenced by AECI and other resources and do not, at this time, have sufficient technical information to establish a default or recommended TRM that would adequately balance reliability and market availability for all parts of North America.</p> <p>Requirement 4</p> <ul style="list-style-type: none"> - R4 is NAESB scope because the requirements address timeframes to provide information and the frequency of recalculation. These requirements at best are minor requirements that will not affect reliability because a TSP can assign a reasonable TRM per R1.2 whether they own the facilities or not and the TRM changes infrequently. These reasons indicate that the requirements should not have a Violation Risk factor of Medium but should not even be requirements. <p>Response: The Drafting Team changed the language to specify "establishing" of the TRM values once every 13 months. The change to "establish" was made to emphasize that simply affirming the current value should continue to be used is sufficient for compliance. The team has moved all the violation risk factors to low. The team has determined that if entities are using these values to allow transactions, then the ATC value (including its components such as TRM) is important to reliability.</p> <ul style="list-style-type: none"> - The "Medium" risk factor is inconsistent with NERC's definition of risk factors and should be changed to "Lower" if the requirement is to be retained. <p>Response: The Drafting Team has modified this risk factor to Lower in response to industry concerns.</p> <p>Requirement 5</p> <ul style="list-style-type: none"> - The "Medium" risk factor is inconsistent with NERC's definition of risk factors and should be changed to "Lower" if the requirement is to be retained. <p>Response: The Drafting Team has modified this risk factor to Lower in response to industry concerns.</p> <ul style="list-style-type: none"> - R5, the measure M5, and the Violation Severity Level should be graded to include the number of facilities or flowgates not provided. Example is if the TSP missed providing TRM information to a requestor on one of the 300 coordinated flowgates and the requestor didn't spot it, but an auditor did 90 days later it is a severe reliability threatening violation. If 5 flowgates were missed that could be considered five separate severe violations for something that can be assigned by TSP for their process, but not easy to determine if the value they used was actually provided by the flowgate owner TSP. <p>Response: The drafting team has modified the VSLs to be more graded.</p>

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Alabama Power Company	<p>We applaud the great work of the standard drafting team. While the current version is "workable" by Industry, making minor changes to the current draft could undermine the integrity of the good work of the drafting team.</p>
<p>Response: Thank you for your support. However, based on industry response, the drafting team has made modifications to the standard and is reposting for another comment period.</p>	
American Electric Power	<p>By definition TRM is a margin based largely upon the confidence in the accuracy of the calculation process for ATC, therefore its more of a TSP function that any other entity. Since TRM is an input to ATC determination, and not used in Operation of the system, the responsibility is misplaced. delegation of this 'responsibility' is not appropriate because TRM is not used in real time operation.</p> <p>Response: In order for the standard to be audited one entity alone must be accountable for a requirement. In the case of TRM the team decided for two reasons to assign this to the Transmission Operator. The first reason was the Transmission Operator is the ultimate customer of this value since the Transmission Operator is the one who has deal with the results of the TRM selection. The second is that the Transmission Operator is the lowest entity in the hierarchy, and in some cases the Transmission Operator may not wish to relegate this authority to someone else, and by not assigning it to them the team would have limited their options in that regard. Ultimately the team believes that in cases where TRM is used, the Transmission Operator is responsible for either developing the TRM or insuring that it is developed. Nothing in the standard prevents the Transmission Operator from contracting the responsibility and accepting another parties TRMID and TRM values.</p> <p>There must also be an exclusion for those partiers that do not calculate ATC -- such as ERCOT, NEISO, AEP (we are a TOP in SPP and PJM)</p> <p>Response: The TRM standard applicability has been modified to apply only to those entities that have elected to maintain a TRM.</p>
<p>Response: Please see in-line responses.</p>	
Dominion Resources, Inc.	<p>In support of PJM comments</p>
<p>Response: Please see response to PJM.</p>	
FirstEnergy Solutions	<p>FirstEnergy Corp. (FE) appreciates the hard work put forth by NERC's ATC Standard Drafting Team. We offer the following general comments in addition to our specific standard comments presented below.</p> <p>CBM & TRM - MARKET AREAS: FE supports the drafting team's approach of three ATC methodologies presented in MOD-028, MOD-029 and MOD-030 to account for differences in calculating ATC in various geographic areas of the bulk electric system. However, the use of a single standard methodology for CBM and TRM as currently written does not meet the needs for entities operating within a market area such as MISO, PJM etc.</p> <p>FE suggests that various requirements in the proposed standards that are currently applicable to the TP and TOP are actually handled by the RTO and within a market area would more appropriately be assigned to the Planning Coordinator (PC) and Reliability Coordinator (RC), respectively. This change would allow the proposed standards for CBM and TRM to be</p>

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	<p>used largely "as is" within both market and non-market areas as the PC and RC would be appropriate in both.</p> <p>Our comments below on specific MOD standards elaborate on this point and provide examples where we feel the applicability is inappropriately assigned to TP or TOP responsible entities within a transmission market construct.</p> <p>DECISION TO BALLOT: While the MOD standards presented are improving in content FE believes the standards should have been issued for one more comment period prior to ballot per the NERC Standard Development Procedures (SDP). In many cases this is only the 2nd draft version being reviewed by industry. The objective during the "Solicit Public Comments on Draft Standard (Step 6)" of the NERC SDP is to "Receive stakeholder inputs on the draft standard for the purpose of assessing consensus on the draft standard, and modifying the draft standard as needed to improve consensus." Based on the 200+ pages of comments of the prior draft version it is hard to conclude that the industry was near consensus. Additionally, per the SDP, now that the standards have gone to First Ballot (Step 9), the standard drafting team is not permitted to make any changes to the standards based on comments received during this First Ballot. The drafting team will now be required to rely on their responses to industry feedback to try and improve consensus during a re-circulation ballot. FE has concerns with the consequences of this decision with regard to the integrity of the standard development process and substantive registered entity perspectives.</p> <p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p> <p>FirstEnergy Corp. (FE) appreciates the hard work put forth by NERC's ATC Standard Drafting Team. However, at this time, FE is voting Negative to this standard with the following comments and suggestions:</p> <ul style="list-style-type: none"> - For utilities involved in market structures, the Transmission Service Provider (TSP) is ultimately responsible for calculating and assuring proper ATC for its footprint. Therefore in these instances it would not be appropriate that the Transmission Operator (TOP) be responsible for maintaining a TRMID. For example, in the MISO footprint, MISO maintains and implements a single TRMID for all of its member companies. The standard should reflect these alternative industry situations through either changes in the requirements or addition of market or regional variances specifically stated in the standard. - Additionally, per MOD-004 R1, the TSP is responsible for maintaining a CBMID, and then it should follow that the TSP and not the TOP would be responsible for maintaining a TRMID. <p>Response: In order for the standard to be audited one entity alone must be accountable for a requirement. In the case of TRM the team decided for two reasons to assign this to the Transmission Operator. The first reason was the Transmission Operator is the ultimate customer of this value since the Transmission Operator is the one who has deal with the results of the TRM selection. The second is that the Transmission Operator is the lowest entity in the hierarchy, and in some cases the Transmission Operator may not wish to relegate this authority to someone else, and by not assigning it to them the team would have limited their options in that regard. Ultimately the team believes that in cases where TRM is used, the Transmission Operator is responsible for either developing the TRM or insuring that it is developed. Nothing in the standard prevents the Transmission Operator from contracting the responsibility and accepting another parties TRMID and TRM values.</p>
	<p>Response: Please see in-line responses.</p>

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Entity	Comment
Florida Municipal Power Agency	We believe this standard needs an additional commenting period.
Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.	
Georgia Power Company	We applaud the great work of the standard drafting team. While the current version is "workable" by Industry, making minor changes to the current draft could undermine the integrity of the good work of the drafting team.
Response: Thank you for your support. However, based on industry response, the drafting team has made modifications to the standard and is reposting for another comment period.	
Gulf Power Company	We applaud the great work of the standard drafting team. While the current version is "workable" by Industry, making minor changes to the current draft could undermine the integrity of the good work of the drafting team.
Response: Thank you for your support. However, based on industry response, the drafting team has made modifications to the standard and is reposting for another comment period.	
Hydro One Networks, Inc.	Hydro One Networks Inc. is casting a negative vote on the 6 MOD standards (MOD-001, MOD-004, MOD-008, MOD-28, MOD-029 and MOSD-030) We believe there is a fundamental issue related with effective dates, that is, the dates in which Reliability Standards become effective and enforceable. In principle, the effective date of standards must be the same for all jurisdictions in North America. It does not make sense that there is a period of time when a standard is effective only in some jurisdictions while not in others. This is particularly important in the MOD Standards in ballot as they have implications on neighbouring areas. The words inserted in the Effective Date of the Standards as well as in the Implementation Plan document permit that these Standards are effective in some jurisdictions and not others. These Standards should be modified to ensure that they become effective in all jurisdiction at the same time, including those where such regulatory approval in not required that is, only when all regulatory approvals have been obtained.
Response: The Drafting Team does not believe this standard must be implemented at the same time throughout North America.	
Lincoln Electric System	LES agrees with the PJM and MISO recommendation that the standard needs an additional commenting period.
Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.	
MidAmerican Energy Co.	I agree with the PJM recommendation that the standard needs an additional commenting period.
Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.	
Mississippi Power	We applaud the great work of the standard drafting team. While the current version is "workable" by Industry, making minor changes to the current draft could undermine the integrity of the good work of the drafting team.
Response: Thank you for your support. However, based on industry response, the drafting team has made modifications to the standard and is reposting for another comment period.	

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Orlando Utilities Commission	This standard should contain only 'lower' level VRF's.
<p>Response: The drafting team has modified the VRFs to be Lower. A medium risk factor is appropriate for "a requirement that, if violated, could directly affect the electrical state or the capability of the bulk power system, or the ability to effectively monitor and control the bulk power system, but is unlikely to lead to bulk power system instability, separation, or cascading failures." A violation of these standards can produce values that indirectly affect the system (i.e., the value may be used in other processes that result in the sale of transmission service), which results in a Lower VRF. The Drafting Team believes that subsequent recalculations of ATC or AFC will help address any incorrect values. Additionally, such a value would be identified and prevented in advance of actual reliability problems by other standards (e.g., SOL or IROL in the FAC standards) as well as the Transmission Operator's existing guidelines and procedures that prevent the Transmission Operator from over-scheduling.</p>	
Public Service Electric and Gas Co.	PSE&G votes NO for the reasons expressed in PJM's comments.
<p>Response: Please see response to PJM.</p>	
Wisconsin Public Service Corp.	WPSC agrees with the PJM and MISO recommendation that the standard needs an additional commenting period
<p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p>	
Florida Municipal Power Agency	We believe this standard needs an additional commenting period.
<p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p>	
Madison Gas and Electric Co.	We agree with the PJM and MISO recommendation that the standard needs an additional commenting period .
<p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p>	
WPS Resources Corp.	<p>Need to include a definition of "TRM".</p> <p>Response: TRM is defined in the NERC glossary of terms: "Transmission Reliability Margin (TRM) — That amount of transmission transfer capability necessary to ensure that the interconnected transmission network is secure under a reasonable range of uncertainties in system conditions. See Available Transfer Capability."</p> <p>R3 - the TRM implementation document (TRMID) should be made available to all users, owners, and operators.</p> <p>Response: R3 applies to the entities that may have a reliability need to review the material, access to the material by others would be established through other processes, for example NAESB.</p>

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Entity	Comment
	<p>R1.1 - a subsection of R1.1 refers to CBM and "generation reliability requirements". CBM should be tied to "resource adequacy assessment requirements".</p> <p>Response: The drafting team revised the wording to remove descriptors beyond CBM.</p>
<p>Response: Please see in-line responses.</p>	
<p>AEP Service Corp.</p>	<p>By definition TRM is a margin based largely upon the confidence in the accuracy of the calculation process for ATC, therefore its more of a TSP function that any other entity. Since TRM is an input to ATC determination, and not used in Operation of the system, the responsibility is misplaced. delegation of this 'responsibility' is not appropriate because TRM is not used in real time operation.</p> <p>Response: In order for the standard to be audited one entity alone must be accountable for a requirement. In the case of TRM the team decided for two reasons to assign this to the Transmission Operator. The first reason was the Transmission Operator is the ultimate customer of this value since the Transmission Operator is the one who has deal with the results of the TRM selection. The second is that the Transmission Operator is the lowest entity in the hierarchy, and in some cases the Transmission Operator may not wish to relegate this authority to someone else, and by not assigning it to them the team would have limited their options in that regard. Ultimately the team believes that in cases where TRM is used, the Transmission Operator is responsible for either developing the TRM or insuring that it is developed. Nothing in the standard prevents the Transmission Operator from contracting the responsibility and accepting another parties TRMID and TRM values.</p> <p>There must also be an exclusion for those partiers that do not calculate ATC -- such as ERCOT, NEISO, AEP (we are a TOP in SPP and PJM)</p> <p>Response: The TRM standard applicability has been modified to apply only to those entities that have elected to maintain a TRM.</p>
<p>Response: Please see in-line responses.</p>	
<p>Calpine Corporation</p>	<p>The former NERC standard for ATC required that TSPs have and publish their methodology for calculation of ATC. Such a standard has clearly been rejected by FERC, instead opting for much greater transparency. However, we note that amongst the redlined changes in the version of MOD-001 that is being balloted, the word "transparency" has been deleted from the purpose.</p> <p>We also note that Requirement R3.1 requires that sufficient data will be exchanged to allow for validation of the ATC calculation but in response to EPSA and many others it is clear that NERC will not mandate what if any of this data will be shared with market participants. By deferring that question to NAESB, it makes it very difficult for market participants to evaluate whether this standard provides sufficient transparency.</p> <p>The notion of an ATCID document is a positive step. To have a single document with a comprehensive list of assumptions represents a substantial improvement over the status quo. However, the utility of this document, is difficult to evaluate if it is not yet determined which parties will have access to the document.</p>

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Entity	Comment
	<p>Furthermore, while flexibility is necessary in order to create a standard with applicability across many jurisdictions, allowing undue flexibility as long as assumptions are captured in the ATCID cannot assure market participants of a sufficient degree of standardization.</p>
<p>Response: These comments are related to the MOD 001 standard and not to the MOD 008 TRM standard; therefore the Drafting Team will not provide a specific response here.</p>	
<p>Electric Power Supply Association</p>	<p>EPSA supports the use of a TRMID document as a positive step toward greater transparency. To have a single document with a comprehensive list of assumptions represents a substantial improvement over the status quo. However, the ultimate use of such a document, cannot be evaluated if the document access has not been clarified.</p> <p>Furthermore, while flexibility is necessary in order to create a standard with applicability across many jurisdictions, allowing undue flexibility as long as assumptions are captured in the TRMID cannot assure market participants of a sufficient degree of standardization.</p>
<p>Response: R3 applies to the entities that may have a reliability need to review the material, access to the material by others would be established through other processes, for example NAESB.</p> <p>We recognize that at this time, the standard is more flexible than might be desired, and will recommend that NERC do additional work after the transparency issues have been addressed. Members of the Drafting Team do not, at this time, have sufficient technical information to establish a default or recommended TRM that would adequately balance reliability and market availability for all parts of North America.</p>	
<p>FirstEnergy Solutions</p>	<p>FirstEnergy Corp. (FE) appreciates the hard work put forth by NERC's ATC Standard Drafting Team. We offer the following general comments in addition to our specific standard comments presented below.</p> <p>CBM & TRM - MARKET AREAS: FE supports the drafting team's approach of three ATC methodologies presented in MOD-028, MOD-029 and MOD-030 to account for differences in calculating ATC in various geographic areas of the bulk electric system. However, the use of a single standard methodology for CBM and TRM as currently written does not meet the needs for entities operating within a market area such as MISO, PJM etc.</p> <p>FE suggests that various requirements in the proposed standards that are currently applicable to the TP and TOP are actually handled by the RTO and within a market area would more appropriately be assigned to the Planning Coordinator (PC) and Reliability Coordinator (RC), respectively. This change would allow the proposed standards for CBM and TRM to be used largely "as is" within both market and non-market areas as the PC and RC would be appropriate in both.</p> <p>Our comments below on specific MOD standards elaborate on this point and provide examples where we feel the applicability is inappropriately assigned to TP or TOP responsible entities within a transmission market construct.</p> <p>DECISION TO BALLOT: While the MOD standards presented are improving in content FE believes the standards should have been issued for one more comment period prior to ballot per the NERC Standard Development Procedures (SDP). In many cases this is only the 2nd draft version being reviewed by industry. The objective during the "Solicit Public Comments on Draft Standard (Step 6)" of the NERC SDP is to "Receive stakeholder inputs on the draft standard for the purpose of assessing consensus on the draft standard, and modifying the draft standard as needed to improve consensus." Based on the 200+ pages of comments of the prior draft version it is hard to conclude that the industry was near consensus. Additionally, per the SDP, now that the standards have gone to First Ballot (Step 9), the standard drafting team is not permitted to make any changes to the standards based on comments received during this First Ballot. The drafting team will</p>

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Entity	Comment
	<p>now be required to rely on their responses to industry feedback to try and improve consensus during a re-circulation ballot. FE has concerns with the consequences of this decision with regard to the integrity of the standard development process and substantive registered entity perspectives.</p> <p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p> <p>FirstEnergy Corp. (FE) appreciates the hard work put forth by NERC's ATC Standard Drafting Team. However, at this time, FE is voting Negative to this standard with the following comments and suggestions:</p> <ul style="list-style-type: none"> - For utilities involved in market structures, the Transmission Service Provider (TSP) is ultimately responsible for calculating and assuring proper ATC for its footprint. Therefore in these instances it would not be appropriate that the Transmission Operator (TOP) be responsible for maintaining a TRMID. For example, in the MISO footprint, MISO maintains and implements a single TRMID for all of its member companies. The standard should reflect these alternative industry situations through either changes in the requirements or addition of market or regional variances specifically stated in the standard. - Additionally, per MOD-004 R1, the TSP is responsible for maintaining a CBMID, and then it should follow that the TSP and not the TOP would be responsible for maintaining a TRMID. <p>Response: In order for the standard to be audited one entity alone must be accountable for a requirement. In the case of TRM the team decided for two reasons to assign this to the Transmission Operator. The first reason was the Transmission Operator is the ultimate customer of this value since the Transmission Operator is the one who has deal with the results of the TRM selection. The second is that the Transmission Operator is the lowest entity in the hierarchy, and in some cases the Transmission Operator may not wish to relegate this authority to someone else, and by not assigning it to them the team would have limited their options in that regard. Ultimately the team believes that in cases where TRM is used, the Transmission Operator is responsible for either developing the TRM or insuring that it is developed. Nothing in the standard prevents the Transmission Operator from contracting the responsibility and accepting another parties TRMID and TRM values.</p>
	<p>Response: Please see in-line responses.</p>
Florida Municipal Power Agency	<p>We believe this standard needs an additional commenting period.</p>
	<p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p>
Lincoln Electric System	<p>LES agrees with the PJM and MISO recommendation that the standard needs an additional commenting period.</p>
	<p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p>
PSEG Power LLC	<p>PSEG Power LLC votes no for the reasons expressed in PJM's comments.</p>

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Entity	Comment
<p>AEP Marketing</p>	<p>By definition TRM is a margin based largely upon the confidence in the accuracy of the calculation process for ATC, therefore its more of a TSP function that any other entity. Since TRM is an input to ATC determination, and not used in Operation of the system, the responsibility is misplaced. delegation of this 'responsibility' is not appropriate because TRM is not used in real time operation.</p> <p>Response: In order for the standard to be audited one entity alone must be accountable for a requirement. In the case of TRM the team decided for two reasons to assign this to the Transmission Operator. The first reason was the Transmission Operator is the ultimate customer of this value since the Transmission Operator is the one who has deal with the results of the TRM selection. The second is that the Transmission Operator is the lowest entity in the hierarchy, and in some cases the Transmission Operator may not wish to relegate this authority to someone else, and by not assigning it to them the team would have limited their options in that regard. Ultimately the team believes that in cases where TRM is used, the Transmission Operator is responsible for either developing the TRM or insuring that it is developed. Nothing in the standard prevents the Transmission Operator from contracting the responsibility and accepting another parties TRMID and TRM values.</p> <p>There must also be an exclusion for those parties that do not calculate ATC -- such as ERCOT, NEISO, AEP (we are a TOP in SPP and PJM)</p> <p>The TRM standard applicability has been modified to apply only to those entities that have elected to maintain a TRM.</p>
<p>Barry Green Consulting Inc.</p>	<p>Transparency: The former NERC standard for ATC required that TSPs have and publish their methodology for calculation of ATC. Such a standard has clearly been rejected by FERC, instead opting for much greater transparency. However, we note that amongst the redlined changes in the version of MOD-001 that is being balloted, the word "transparency" has been deleted from the purpose.</p> <p>We also note that Requirement R3.1 requires that sufficient data will be exchanged to allow for validation of the ATC calculation but in response to EPSA and many others it is clear that NERC will not mandate what if any of this data will be shared with market participants. By deferring that question to NAESB, it makes it very difficult for market participants to evaluate whether this standard provides sufficient transparency.</p> <p>The notion of a TRMID document is a positive step. To have a single document with a comprehensive list of assumptions represents a substantial improvement over the status quo. However, the utility of this document is difficult to evaluate if it is not yet determined which parties will have access to the document.</p> <p>Furthermore, while flexibility is necessary in order to create a standard with applicability across many jurisdictions, allowing undue flexibility as long as assumptions are captured in the TRMID cannot assure market participants of a sufficient degree of standardization.</p>
	<p>Response: These comments are related to the MOD 001 standard and not to the MOD 008 TRM standard; therefore the Drafting Team will not provide a specific response here.</p>

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Entity	Comment
<p>We recognize that at this time, the standard is more flexible than might be desired, and will recommend that NERC do additional work after the transparency issues have been addressed. Members of the Drafting Team do not, at this time, have sufficient technical information to establish a default or recommended TRM that would adequately balance reliability and market availability for all parts of North America.</p>	
<p>Dominion Resources, Inc.</p>	<p>Support comments provided by PJM</p>
<p>Response: Please see response to PJM.</p>	
<p>FirstEnergy Solutions</p>	<p>FirstEnergy Corp. (FE) appreciates the hard work put forth by NERC's ATC Standard Drafting Team. However, at this time, FE is voting Negative to this standard with the following comments and suggestions:</p> <ul style="list-style-type: none"> - For utilities involved in market structures, the Transmission Service Provider (TSP) is ultimately responsible for calculating and assuring proper ATC for its footprint. Therefore in these instances it would not be appropriate that the Transmission Operator (TOP) be responsible for maintaining a TRMID. For example, in the MISO footprint, MISO maintains and implements a single TRMID for all of its member companies. The standard should reflect these alternative industry situations through either changes in the requirements or addition of market or regional variances specifically stated in the standard. - Additionally, per MOD-004 R1, the TSP is responsible for maintaining a CBMID, and then it should follow that the TSP and not the TOP would be responsible for maintaining a TRMID.
<p>Response: In order for the standard to be audited one entity alone must be accountable for a requirement. In the case of TRM the team decided for two reasons to assign this to the Transmission Operator. The first reason was the Transmission Operator is the ultimate customer of this value since the Transmission Operator is the one who has deal with the results of the TRM selection. The second is that the Transmission Operator is the lowest entity in the hierarchy, and in some cases the Transmission Operator may not wish to relegate this authority to someone else, and by not assigning it to them the team would have limited their options in that regard. Ultimately the team believes that in cases where TRM is used, the Transmission Operator is responsible for either developing the TRM or insuring that it is developed. Nothing in the standard prevents the Transmission Operator from contracting the responsibility and accepting another parties TRMID and TRM values.</p>	
<p>Lincoln Electric System</p>	<p>LES agrees with the PJM and MISO recommendation that the standard needs an additional commenting period.</p>
<p>Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.</p>	
<p>MidAmerican Energy Co.</p>	<p>Although this standard leaves much to be desired, it is better than the current standard. I hope NERC continues to work towards consistency in the arena of TRM.</p>
<p>Response: Thank you for your support. However, based on industry response, the drafting team has made modifications to the standard and is reposting for another comment period.</p>	
<p>PSEG Energy Resources & Trade LLC</p>	<p>PSEG Energy Resources & Trade LLC votes NO for the reasons expressed in PJM's ballot.</p>

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Entity	Comment
Response: Please see response to PJM.	
Wyoming Public Service Commission	Should not prevent the inclusion of intermittent resources if they exhibit sufficient diversity and can be successfully integrated.
Response: Nothing in the TRM standard prevents the inclusion of intermittent resources.	
Midwest Reliability Organization	The MRO agrees with the PJM and MISO recommendation that the standard needs an additional commenting period.
Response: The Drafting Team has withdrawn the standard from the balloting process and will be posting it again for industry comment.	