

**Individual or group. (28 Responses)**

**Name (15 Responses)**

**Organization (15 Responses)**

**Group Name (13 Responses)**

**Lead Contact (13 Responses)**

**IF YOU WISH TO EXPRESS SUPPORT FOR ANOTHER ENTITY'S COMMENTS WITHOUT ENTERING ANY ADDITIONAL COMMENTS, YOU MAY DO SO HERE. (8 Responses)**

**Comments (28 Responses)**

**Question 1 (0 Responses)**

**Question 1 Comments (20 Responses)**

**Question 2 (0 Responses)**

**Question 2 Comments (20 Responses)**

Group
Northeast Power Coordinating Council
Guy Zito
<p>The first sentence of the Purpose clearly conveys the purpose of the standard, making the second sentence unneeded. The second sentence also creates confusion with the intent of the standard by having the inconsistent wording “available transmission system transfer capability” and “available transmission system capability” in the Purpose. We agree with the Independent Experts recommendations that the requirement for developing a written methodology (or methodologies) for determining TFC or TTC (as per R1) should be moved to a FAC standard, e.g. FAC-013, if not already adequately covered by a related FAC standard. There is some degree of overlap between R1 of the proposed MOD-001-2 and the FAC standard(s). Having two similar requirements in two standards are unnecessary, and may result in a double jeopardy situation. The SDT should remove, map or combine R1 with like requirements in the appropriate FAC standard. The last bullet in Measure M1 is written as a requirement, not a measure. This bullet stipulates that the Transmission Operator shall also be using their current method to determine TFC or TTC. R1 requires the development of a methodology for determining TFC or TTC, but does not require the use of the methodology to calculate TFC or TTC. If using the developed methodology to determine TFC or TTC is a requirement, then it should be so stipulated in R1, or in a new R2, but should not be embedded in a measure. We also agree with the Independent Experts’ recommendations to remove the requirements for developing an AFCID or ATCID (R2, in the proposed MOD-001-2), or to request NAESB to adopt or develop these requirements in their business practices. These IDs are intended for calculating the AFCs or ATCs for business usage, and do not contribute to ensuring BES reliability. We suggest to remove R2 from the proposed standard. With regard to the preceding comments, suggest removing all references to ATC and AFC in Requirements R5 and R6. Requirement R3 stipulates that the TSP develop a Capacity Benefit Margin Implementation Document (CBMID) that describes its method for establishing CBM. R3 does not stipulate the requirement for the TSP to determine CBM values. Measure M3 implies that the TSP shall determine CBM values using the developed CBMID, and asks current CBM values, or other evidence (such as written documentation, study reports, or supporting information) to demonstrate that it established</p>

CBM values consistent with its methodology described in the CBM. The requested evidence does not correspond with the requirement. Therefore, either the requirement needs to be expanded to stipulate the TSP’s obligation in determining CBM values, or M3 be revised to remove references to CBM values. Suggest the latter approach since determination of the CBM values is part of ATC calculation which is regarded a business practice that should be addressed by or mapped to NAESB standards. The preceding comment also applies to Requirement R4, except in this case, it is the TOP’s Transmission Reliability Margin Implementation Document (CBMID). R5 is prone to requests for interpretation, as witnessed in a number of past interpretation requests on requirements that stipulate two separate Responsible Entities being held accountable for two different tasks (TOP and BA in some TOP standards). R5 as presented will likely invite requests for interpretation on which entity is responsible for what part of the requirement. Suggest that the SDT consider splitting this requirement into two requirements – one for the TSP to respond to requests on CBMID, and one for the TOP to respond to requests on TRMID and TFC/TTC methodology. The comment regarding the potential for requests for interpretation for requirements that stipulate two separate Responsible Entities being held accountable for two different tasks also applies to R6. The need for R6 should be reviewed in accordance with the Purpose of the standard, and the intent of Requirements R3 and R4, as commented above. Are the two requirements to stipulate the development of the CBMID and the TRMID only? Or are they also intended to stipulate the requirements for calculating CBM values and TRM values using the established methodologies? If it is the former, then there should not be any request for and response to requests for data provision. If it the the latter, then R3 and R4 need to be revised to clearly stipulate the obligations for calculating such values. The Purpose statement of the standard does not appear to support the latter. Also, as indicated in the preceding comments, determination of CBM values and TRM values is part of ATC calculation which is regarded a business practice that should be addressed by or mapped to NAESB standards.

Individual

Thomas Foltz

American Electric Power

AEP objects to the inclusion of the Transmission Operator as an applicable Functional Entity. Though the draft was improved somewhat by the recently proposed qualifier to R1 regarding Transmission Operators “that determines Total Flowgate Capability (TFC) or Total Transfer Capability (TTC)”, it still puts entities in a position of having to prove to an auditor that their Transmission Operators do not perform this work. AEP has previously been in the position of proving to an auditor that we \*don’t\* perform certain work functions, and “proving a negative” can be challenging. If Transmission Operator is retained as a Functional Entity, we believe it would be preferable to instead state “Each Transmission Operator or Transmission Service Provider that determines Total Flowgate Capability (TFC) or Total Transfer...”

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. Although the most recent changes were beneficial in that regard, we believe it would be preferable to

qualify R1 to state “Each Transmission Operator or Transmission Service Provider that determines Total Flowgate Capability (TFC) or Total Transfer...”

Individual

Kathleen Goodman

ISO New England, Inc.

Agree

IRC SRC

Individual

Michael Falvo

Independent Electricity System Operator

1. We do not support the second sentence in the Purpose Section since the first sentence already clearly conveys the purpose of the standard. The second sentence is totally unnecessary. In fact, it creates a confusion of the intent of the standard, notwithstanding that there are inconsistent wording between “available transmission system transfer capability” and “available transmission system capability” throughout the Purpose Section. 2. We do not agree with the proposed revision to MOD-001-2 standard in the following aspects: a. We agree with the Independent Experts recommendations that the requirement for developing a written methodology (or methodologies) for determining TFC or TTC, i.e. R1, should be moved to an FAC standard, e.g. FAC-013, if not already adequately covered by the related FAC standard. There is some degree of overlap between R1 of the proposed MOD-001-2 and the FAC standard(s). Having two similar requirements in two standards are unnecessary, and may result in double-jeopardy. We urge the SDT to remove or map or combined R1 with like requirements in the appropriate FAC standard. b. Notwithstanding the above suggestion, we find the last bullet in Measure M1 to be a requirement, not a measure. This bullet stipulates that the Transmission Operator shall also be using their current method to determine TFC or TTC. R1 requires the development of a methodology for determining TFC or TTC, but does not require the use of the methodology to calculate TFC or TTC. If using the developed methodology to determine TFC or TTC is a requirement, then it should be so stipulated in R1, or in a new R2, but should not be imbedded in a measure. c. We also agree with the Independent Experts recommendations to remove the requirements for developing an AFCID or ATCID (R2, in the proposed MOD-001-2), or to request NAESB to adopt or develop these requirements in their business practices. These IDs are intended for calculating the AFCs or ATCs for use by business activities and thus do not contribute to ensuring BES reliability. We suggest to remove R2 from the proposed standard. d. In connection to the above comments, we suggest removing all references to ATC and AFC in Requirements R5 and R6. e. Requirement R3 stipulates that the TSP develop a Capacity Benefit Margin Implementation Document (CBMID) that describes its method for establishing CBM. R3 does not stipulate the requirement for the TSP to determine CBM values. Measure M3 implies that the TSP shall determine CBM values using the developed CBMID, and asks current CBM values, or other evidence (such as written documentation, study reports, or supporting information) to demonstrate that it established CBM values consistent with its methodology described in the CBM. The requested evidence does not correspond with the requirement. Therefore, either the requirement needs to be expanded to stipulate the

TSP's obligation in determining CBM values, or M3 be revised to remove references to CBM values. We suggest the latter approach since determination of the CBM values is part of ATC calculation which is regarded a business practice that should be addressed by or mapped to NAESB standards. f. The above comment also applies to Requirement R4, except in this case, it is the TOP's Transmission Reliability Margin Implementation Document (CBMID). g. We find R5 to be prone to requests for interpretation, as witnessed in a number of past interpretation requests on requirements that stipulate two separate Responsible Entities being held accountable for two different tasks (TOP and BA in some TOP standards). R5 as presented will likely invite requests for interpretation on which entity is responsible for what part of the requirement. We strongly suggest that the SDT consider splitting this requirement into two requirements – one for the TSP to respond to requests on CBMID, and one for the TOP to respond to requests on TRMID and TFC/TTC methodology. h. The comment in (g) regarding the potential for requests for interpretation for requirements that stipulate two separate Responsible Entities being held accountable for two different tasks also apply to R6. Notwithstanding this comment, the need for R6 should be reviewed in accordance with the purpose of the standard, and the intent of Requirements R3 and R4, as commented above. Are the two requirements to stipulate the development of the CBMID and the TRMID only? Or are they also intended to stipulate the requirements for calculating CBM values and TRM values using the established methodologies? If it is the former, then there should not be any request for and the response to requests for data provision. If it the the latter, then R3 and R4 need to be revised to clearly stipulate the obligations for calculating such values. The purpose statement of the standard does not appear to support the latter. Also, as indicated in Comments (e) and (f), above, determination of CBM values and TRM values is part of ATC calculation which is regarded a business practice that should be addressed by or mapped to NAESB standards.

Group

Oklahoma Gas & Electric

Terri Pyle

OG&E still strongly agree with the reasoning made by Florida Municipal Power Agency (in the initial ballot) on removing TOP from being responsible for TTC/TFC and TRM calculations. Therefore, we suggest the following changes: • From the applicability section 4.1.1 remove Transmission Operator. • R1, change the responsibility from the TOP to the TSP. We recognize that this change would also requires 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. Note: Refer to NERC's Reliability Functional Model document (Version 5, November 2009). Pages 37-39 describe Transmission Operator's function and tasks. • 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 and R6, change the responsibilities to refer only to the Transmission Service Provider (TSP).

Group

Arizona Public Service Company

Janet Smith

1.R1.3.1 implies that the constraints that are requested by the other TOP needs to be included. It is not clear if it applies only to thermal constraints or if it also applies to other constraints such as voltage. R1.3.1 and R1.3.2 seems to imply that it only applies to thermal since it refers to distribution factor, if this is the intent R1.3 needs to be clarified as such. 2.It is not clear what needs to be included in ATCID to comply with R2.1.3 and this should be clarified to this effect. 3.It is not clear why separate documents are required for ATC, CBM, and TBM. CBM and TBM should be included in ATCID document and thus R3 and R4 should be merged into R2.

R5 and R 6 both refer to responding for a request from other TOP. It would be best if it is combined into a single requirement or omitted since they are administrative in nature and not a true reliability requirement.

Group

MRO NERC Standards Review Forum

Russ Mountjoy

The revised Purpose section references “Bulk Power System”, the NSRF suggests that it should be changed to “Bulk Electric System”. The NSRF recommends this due to the new BES definition will “pull in” any <100 Kv systems that MOD-001-2 would be applicable too.

Individual

David Jendras

Ameren

Agree

We support SERC Planning Standards Subcommittee (PSS) comments

Individual

Romel Aquino

Southern California Edison

Agree

FMPA (Florida Municipal Power Authority)

Group

ISO/RTO Standards Review Committee

Greg Campoli

1. The drafting team has revised MOD-001-2 in response to stakeholder comments and suggestions. If you do not agree or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments. 0 Yes 0 No  
Comments: PURPOSE 1. The SRC can support the revised Purpose statement if it were limited

to the first sentence as the first sentence clearly conveys the purpose of the standard. The proposed second sentence is unnecessary and creates confusion as to the intent of the standard. Moreover, the SRC is concerned with the inconsistent wording in sentence 2 regarding the terms “available transmission system transfer capability” and “available transmission system capability”. REQUIREMENTS 2. We do not agree with the proposed revision to MOD-001-2 standard in the following aspects: a. We find the last bullet in Measure M1 to be a requirement, not a measure. This bullet stipulates that the Transmission Operator shall use their current method to determine TFC or TTC. R1 requires the development of a methodology for determining TFC or TTC, but does not require the use of the methodology to calculate TFC or TTC. If using the developed methodology to determine TFC or TTC is a requirement, then it should be so stipulated in R1, or in a new R2, but should not be imbedded in a measure. b. We find R5 to be prone to requests for interpretation, as witnessed in a number of past interpretation requests on requirements that stipulate two separate Responsible Entities being held accountable for two different tasks (TOP and BA in some TOP standards). R5 as presented will likely invite requests for interpretation on which entity is responsible for what part of the requirement. The SRC recommends splitting this requirement into two requirements – one for the TSP to respond to requests on CBMID, and one for the TOP to respond to requests on TRMID and TFC/TTC methodology. c. The above comment to R5 regarding the potential for requests for interpretation for requirements that stipulate two separate Responsible Entities being held accountable for two different tasks also applies to R6. Notwithstanding this comment, the need for R6 should be reviewed in accordance with the purpose of the standard, and the intent of Requirements R3 and R4, as commented above. Are the two requirements to stipulate the development of the CBMID and the TRMID only? Or are they also intended to stipulate the requirements for calculating CBM values and TRM values using the established methodologies? If it is the former, then there should not be any request for and the response to requests for data provision. If it the the latter, then R3 and R4 need to be revised to clearly stipulate the obligations for calculating such values. The purpose statement of the standard does not appear to support the latter. [R1.1] - 1.1 states, “pre- and post-contingency state:” Is there a formal NERC definition for post contingent state? Is it up to the TOP to define the post-contingency state? [R1.2] - We believe that 1.2.1 and 1.2.5 maybe applicable to TTC but not TFC. Can we say these provisions are not applicable to TFC? Currently, there’s no clear indication that we can state that they are not applicable to TFC. We suggest revising the language to clearly state that if it’s not applicable to TFC then state it’s not applicable to TFC. [M1] - “Simulation being used to find the max TFC or TTC that remains within the limit” – this is not applicable to Flowgate methodology. Can we state as such? Currently, there’s no clear indication that we can state that they are not applicable to TFC. We suggest revising the language to clearly state that if it’s not applicable to TFC then state it’s not applicable to TFC. “The application of a distribution factor in determining if a limit affects the TFC or TTC value” – this is not applicable to Flowgate methodology. Can we state as such? Currently, there’s no clear indication that we can state that they are not applicable to TFC. We suggest revising the language to clearly state that if it’s not applicable to TFC then state it’s not applicable to TFC. “A statement that the monitoring of a select limit(s) results in the TFC or TTC not exceeding another set of limits” What does “another set of limits” means? Should there be

additional description to add more clarity? [R2] - 2.1.4 states, "Planned outages;" Why not also include forced outages or other known outages? (same comment applies to 1.2.4) 2.2 states "for reliability constraints". We suggest changing this to "for reliability-related constraints" to be consistent with the language in 1.3. VRF / VSLs Table of Compliance Elements: [R1(VSL)] - We suggest moving the following from High VSL to Moderate "Each Transmission Operator that determines TFC or TTC has not described the process for including any reliability-related constraints that have been requested by another Transmission Operator, provided the constraints are also used in the requesting Transmission Operator's TFC or TTC calculation and the request referenced" [R1(VSL)] - We suggest moving the following from High VSL to Moderate "Each Transmission Operator that determines TFC or TTC has not used (i) an impact test process for including requested constraints, (ii) a process to account for requested constraints that have a five percent or greater distribution factor for a transfer between areas in the TTC determination, or (iii) a mutually agreed upon method for determining whether requested constraints need to be included in the TFC or TTC determination. (1.3.1, 1.3.2, 1.3.3)" [R2(VSL)] - We suggest moving the following from High VSL to Low because the TSP is still calculating AFCs "Each Transmission Service Provider that uses the Flowgate Methodology did not use the AFC determined by the Transmission Service Provider for reliability constraints identified in part

ERCOT abstained from signing on to these comments because the standard does not apply to them. PJM will submit its own comments.

Individual

Shirley Mayadewi

Manitoba Hydro

Manitoba Hydro is in general agreement with the standard but we have the following comments: (1) Purpose – the language fluctuates between available transmission system capability and available transmission system transfer capability. Unless these are meant to refer to two different things, a consistent reference should be used. (2) R1, 1.3 – it would be more accurate if the opening line said '...the process for determining whether to include any reliability related constraints...' as opposed to '...including any reliability related constraints' because it may be that it is determined that they not be included. (3) R1, 1.3.2 – the words 'in its methodology' are missing after the word 'describe'. (4) M1 – there doesn't seem to be any measure related to the requirement in 1.3.3. (5) R2 , 2.1 – suggest changing 'that' to 'provided that such elements' in the opening lines of 2.1 (6) R2, 2.2 – R2 is focused on Transmission Service Providers and their methodologies. However, there is a cross reference to reliability constraints identified in part 1.3 and part 1.3 doesn't apply to TSPs, only TOs. Will this creates a gap, or would TOs have the same information as TSPs would have? (7) M2 – the requirement in R2 is to document current practice. The last bullet of M2 is about measuring whether or not the TSP is using its current method. It would be more closely aligned with the requirement itself if this bullet was phrased in a way that referred to the methodology being reflective of actual current method. The evidence could be the same. (8) M3 – the requirement refers to TSPs that 'determine' CBM as does the first clause of the measure. However, then the measure refers to the TSPs that don't 'maintain' CBM– this language should be consistent. (9) R5 – no

guidance given as to what 'demonstrating a reliability need' is and how this should be assessed. Presumably this is in the responsible entity's sole judgment. (10) M5- the punctuation in this sentence results in the measure not matching the requirement. It should be rewritten as follows: Examples of evidence include, but are not limited to, dated records of the request from a Planning Coordinator, Reliability Coordinator, Transmission Operator, Transmission Planner, Transmission Service Provider, or another registered entity who demonstrates a reliability need, and the Transmission Service Provider's response to the request, or if no requests have been received, a statement by the Transmission Service Provider that they have received no requests. (11) R6 – no guidance given as to what 'on an ongoing basis' means. The word 'beginning' should be added after the words 'on an ongoing basis'. 6.1 has deleted the words 'at regular intervals' while the measure still contains these words. (12) Compliance 1.3 - The language refers specifically to a process found in the NERC Rules of Procedure. Generally in draft standards, there is just a list of processes that may be used. The reference is concerning because MB Hydro has their own Compliance and Monitoring program and has only adopted select aspects of the NERC Rules of Procedure. (13) VSLs, R1, High VSLs – 'Any' could be interpreted to mean 'any one of' while in this case it seems to be intended to refer to all of the limitations. (14) VSL, R3 – the language of the requirement is 'determines' CBM values, while the language of the VSL is 'uses' CBM values. Also, in the requirement it refers to the CBMID describing the method for establishing CBM, while the VSL uses the word determines. The language should be consistent between the requirement and the VSL. (15) VSL, R4 – same comment as VSL, R3 above. (16) VSL, R5 – the requirement is to provide a written response while the VSL refers only to 'respond'.

Group

Bonneville Power Administration

Jamison Dye

BPA supports the draft standard as written.

Individual

Angela P Gaines

Portland General Electric Company

Previous MOD's have specified the allowable TTC limits that can be applied for counter flow schedules. There should be more required in MOD-A to provide some level of guidance for schedules in the direction counter to prevailing flows.

Individual

Brett Holland

Kansas City Power & Light

We previously commented that the term "used by" was vague with respect to whether or not a TOP needed a TFC/TTC methodology in Requirement 1. In this version, it has been change to "Each TOP that determines" TTC/TFC. We would argue that "determining" would be the actual act of calculating and that since some registered entities do not make these calculations, then those REs would not need a methodology. R1.3.1 and 1.3.2 still reference the TOP that "uses" a

specific methodology. This is still too vague of terminology for standard language.
Individual
Richard Vine
California ISO
Agree
ISO/RTO Standards Review Committee
Individual
Anthony Jablonski
ReliabilityFirst
Even though ReliabilityFirst votes in the Affirmative, ReliabilityFirst believes a comment submitted through the last comment period was either overlooked or not addressed. ReliabilityFirst believes 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.
Group
SPP Standards Review Group
Robert Rhodes
Yes We suggest that the reference to the Bulk Power System (BPS) in the Purpose be changed to the Bulk Electric System (BES). In the Rationale Box for R1, capitalize Real-time. In the Rationale Box for R6, there are a couple of instances where 'is' is used as the verb with TOP and TSP. This should be changed to 'are'. Also, we suggest the following change in the 2nd sentence: '...modify that data from the form in which they use or maintain it.'
We appreciate the effort the drafting team has made in modifying the proposed standard and believe the current proposal is an improvement over the previous version.
Group
SERC Planning Standards Subcommittee
Jim Kelley
Yes. Current language for Measure 1, 4th sub-bullet: (1.3) A copy of the request and a description of the method used to perform the impact test (1.3.1) or account for the requested constraints (1.3.2). Suggested modification for Measure 1, 4th sub-bullet: (1.3) A copy of the request and a description of the method used to perform the impact test (1.3.1), or account for the requested constraints (1.3.2), or a description of a different method used (1.3.3). The SDT is respectfully requested to review the term "determines" in R3 for possible replacement by "maintains". Current R3 language: Each Transmission Service Provider that determines Capacity Benefit Margin (CBM) values shall develop a Capacity Benefit Margin Implementation

Document (CBMID) that describes its method for establishing CBM. The method described in the CBMID shall reflect the Transmission Service Provider's current practices for determining CBM values. Suggested R3 modification: Each Transmission Service Provider that DELETE: determines ADD: "maintains" Capacity Benefit Margin (CBM) values shall develop a Capacity Benefit Margin Implementation Document (CBMID) that describes its method for establishing CBM. The method described in the CBMID shall reflect the Transmission Service Provider's current practices for determining CBM values.

The SDT is requested to either change the term "affidavit" or add the term "attestation" to M3 and M4. An example follows for the SDT consideration of one option: Current M3 language: M3. Each Transmission Service Provider that determines CBM shall provide evidence, including, but not limited to, its current CBMID, current CBM values, or other evidence (such as written documentation, study reports, or supporting information) to demonstrate that it established CBM values consistent with its methodology described in the CBMID. If a Transmission Service Provider does not maintain CBM, examples of evidence include, but are not limited to, an affidavit, statement, or other documentation that states the Transmission Service Provider does not maintain CBM. Possible M3 language modification by adding "attestation": M3. Each Transmission Service Provider that determines CBM shall provide evidence, including, but not limited to, its current CBMID, current CBM values, or other evidence (such as written documentation, study reports, or supporting information) to demonstrate that it established CBM values consistent with its methodology described in the CBMID. If a Transmission Service Provider does not maintain CBM, examples of evidence include, but are not limited to, an affidavit, ADD: "attestation", statement, or other documentation that states the Transmission Service Provider does not maintain CBM. The comments expressed herein represent a consensus of the views of the above named members of the SERC Planning Standards Subcommittee (PSS) only and should not be construed as the position of the SERC Reliability Corporation, or its board or its officers.

Individual

Jason Snodgrass

Georgia Transmission Corporation

GTC agrees in general but thinks that alternative language would provide more clarity in some places shown below. For R2, replace "determine" with "establish": R2. Each Transmission Service Provider that establishes Available Flowgate Capability (AFC) or Available Transfer Capability (ATC) shall: Relocate "Develop an ATCID..." to R2.1: 2.1. Develop an Available Transfer Capability Implementation Document (ATCID) that describes the methodology (or methodologies) it uses to establish AFC or ATC values. Each methodology shall describe the method used to account for the following elements that impact the establishment of AFC or ATC: The last bullet item for M2 seems to be an additional Requirement which is not listed in R2 or in its sub-requirements. Please either remove, clarify the intent, or create a new R2.2 to correspond such as: 2.2. Demonstrate that current AFC or ATC values are established in accordance with the current methodology (or methodologies) developed using R2.1. If the SDT decides to accept the proposed R2.2, then increment the existing R2.2 to R2.3 and replace "determined" with "established" For 2.3. Each Transmission Service Provider that uses the

Flowgate Methodology shall, for reliability constraints identified in part 1.3, use the AFC established by the Transmission Service Provider for that constraint. For R3, the last sentence is somewhat confusing and could easily be clarified/simplified. R3. Each Transmission Service Provider that establishes Capacity Benefit Margin (CBM) values shall develop a Capacity Benefit Margin Implementation Document (CBMID) that describes its method for establishing CBM. The Transmission Service Provider shall demonstrate that current CBM values are established in accordance with the current CBMID. For R4, the last sentence could be clarified/simplified. R4. Each Transmission Operator that determines establishes Transmission Reliability Margin (TRM) shall develop a Transmission Reliability Margin Implementation Document (TRMID) that describes its method for establishing TRM. The Transmission Operator shall demonstrate that current TRM values are established in accordance with the current TRMID. For VRF/VSLs: GTC suggest making the corresponding changes as mentioned above with respect to use of the terms "determine" "establish", and other clarifying changes, etc.

Individual

Oliver Burke

Entergy Services, Inc.

Agree

Entergy Transmission supports the comments provided by SERC's Planning Standards Subcommittee.

Individual

Steven Mavis

Southern California Edison Company

Agree

FMPA (Florida Municipal Power Authority)

Group

ACES Standards Collaborators

Ben Engelby

(1) We appreciate the drafting team's effort in consolidating the MOD standards. In addition, we generally agree with the refinements to the standard from the previous draft. There are a few items that we believe can be improved, as stated below. (2) For R1, we suggest the SDT delete parts 1.1.1 through 1.1.4 because they are SOLs. We do not see the need to have a sub-part 1.1.5 to include "other SOLs" because the NERC term will encompass all sub-parts 1.1.1 through 1.1.4. These sub-parts should be removed and the requirement should reference SOLs. (3) For R1, part 1.3, who determines the proper constraints from another TOP? Is it the TOP who makes the request first? What if those constraints do not apply to another TOP? How is it possible that one TOP has authority over another TOP? This requirement needs further refinement to clarify what is needed for reliability purposes. If two entities are registered for the same function, there should be equal authority and coordination should occur to determine if there are any reliability-related constraints. (4) For R1, part 1.3.3, we believe this approach is reasonable. The only area of difficulty for compliance purposes is what evidence needs to be maintained. We ask that the drafting team provide a measure for this agreement

among the TOPs. Evidence could include emails, attestations, meeting minutes, or other agreements between the TOPs. (5) For R2, the requirement should reflect that once TTC/TFC is complete per R1, then determining AFC/ATC could be a simple algebraic calculation. The requirement as written, in parts 2.1.1 through 2.1.7, implies another load flow study must be performed to calculate AFC/ATC, which may not be necessary. (6) For R3 and R4, we recommend adding attestation in the measure for entities that do not determine CBM or TRM. We recommend changing affidavit to attestation so the measures reflect current industry practices for maintaining compliance evidence. Affidavits generally refer to sworn statements given during a legal proceeding and have additional requirements such as being notarized. We do not think it is proper to use affidavit and ask the drafting team to use attestation instead. Use of attestations is consistent with the “note to auditor” section in the RSAW for requirements R3 and R4. (7) For R6, this requirement meets Paragraph 81 criteria because it is administrative, focuses on data collection activities, and requires periodic updates that do not directly support reliability. This requirement should be struck in its entirety.

(1) While we appreciate the compliance input for this standard, we would ask that the drafting teams reach out to compliance during the informal development process and post compliance guidance and a draft RSAW with the draft standard during the initial posting. This material is important to the commenting process and having all information at the outset may alleviate some of industry’s concerns. (2) In the compliance guidance document, there are several statements that the auditors will be focusing on the most recent values instead of historical evidence and the audit teams will be looking “forward” to ensure an entity is following its methodology to determine a given value. We support this approach since it is consistent with the Reliability Assurance Initiative (RAI). In light of the RSAW, we question the need for the standard to require a five years evidence retention period for implementation and methodology documents (MOD-001-2, Section C Compliance, Part 1.2 Evidence Retention). The TOP will be audited every three years, so having five years of evidence is unnecessary because the documents older than three years will already have been reviewed in a prior audit. If compliance auditors are only going to be verifying the most recent methodology, then that is all that should be retained. We recommend modifying the compliance evidence retention section to reflect the NERC compliance department approach. (3) The VSLs use the term “current” for severe violations. While we can understand the rationale of not having a written methodology may meet a severe category, using the term “current” could potentially result in negative impacts for enforcement. It would appear that if an entity did not include one limitation in its methodology that would be a lower VSL. However, if circumstances changed that required an entity to add a limitation but did not (still only one limitation not included), then its written methodology would not be current, resulting in a severe violation. We recommend removing the “current” methodology from VSLs because it could be misinterpreted. (4) Thank you for the opportunity to comment.

Group

Tennessee Valley Authority

David Thompson

TVA recognizes the tremendous effort put forth by the Standard Drafting Team in order to

draft completely new transfer capability standards in such a short time period. TVA also understands the significance of the goal of the drafting team to make the MOD standards less onerous and complicated while still maintaining the focus on system reliability. It is our opinion that the new MOD standards in MOD-A have moved too far towards a fill-in-the-blank type standard and do very little to maintain the reliability of transfer capability calculations. The few requirements that do help maintain the reliability of the transfer capability calculations do not apply to everyone and therefore unfairly punish entities use more accurate methodologies such as AFC. For example, R2. 2.2 states, "Each Transmission Service Provider that uses the Flowgate Methodology shall, ...use the AFC determined by the Transmission Service Provider for that constraint." The requirement is essentially optional because it only applies to entities that use the flowgate methodology, yet has a High Violation Severity Level. An essentially optional requirement should not be considered a High VSL. TVA recognizes the importance of sharing AFC data and support the requirement's intentions. But if the requirement is only going to apply to some entitles that choose to use the AFC method then the requirement should be a Low VSL. Also, it should be recognized that these AFC processes are automated processes and some leeway should be given to processing errors. At times these processes have hiccups, e.g. when a flowgate name changes occur with model changes, AFC overrides could be potentially missed. A tiered approach to the Severity Level may make more sense with some room for processing errors. TVA also feels that the requirement could be reworded to recognize the fact that an entity can only use AFCs that are provided to it by the neighboring entity. If AFCs are not provided then they should not be required to be used. The language could be changed to, "each Transmission Service Provider that uses the Flowgate Methodology shall, for reliability constraints identified in part 1.3, use the AFC if provided by the Transmission Service Provider for that constraint." The same logic applies to the TRM and CBM methodologies. Using CBM and TRM increase the reliability of the system, but those entities that choose to use TRM and CBM are unfairly singled out to Severe Violation Severity Level requirements. By not having CBM and TRM you potentially decrease system reliability and at the same time decrease your compliance risk. If the Standard Drafting Team truly feels that TRM and CBM are not reliability requirements then they requirements should not exist. If the TRM and CBM requirements are just going to be fill-in-the-blank transparency type requirements then they should not have Severe Violation Severity Levels. Because of the change of the MOD standards to more of a fill-in-the-blank type standard and the incorrect application of compliance risk, such that those entities that try to increase the reliability of their transfer capability calculations end up increasing their compliance risk, TVA votes "No" on the Project 2012-05 ATC Revisions (MOD A).

Group

Florida Municipal Power Agency

Frank Gaffney

FMPA continues to vote Negative for the MOD-001, MOD A project for one primary reason. FMPA believes strongly that the TSP should be the entity that calculates TTC/TFC and TRM and not the TOP. We also believe strongly that TTC/TFC/TRM are commercial values and not reliability values. As such, FMPA believes that this standard eventually belongs within the

NAESB business practice standards and not the NERC reliability standards. If the TTC/TFC/TRM calculations are not assigned to the TSP and remain with the TOP, this transition to NAESB will not likely happen. There are many reasons that FMPA believes that TTC/TFC/TRM are commercial in nature and not reliability in nature: 1. Nowhere in the standards are TOPs or RCs required to operate to TTC/TFC. Instead they are required to operate to SOLs and IROLs. If TTC/TFC were reliability in nature, there would be a requirement in the standards to operate to them. Even in the NAESB standard (WEQ-008) on Transmission Loading Relief (TLR), transactions are not curtailed if TTC/TFC is exceeded, but rather only when SOLs are exceeded. 2. TTC/TFC are only at ATC paths, SOLs/IROLs are wherever it is necessary to define reliability limits. ATC paths are determined primarily by commercial considerations, such as the interfaces between BAs, and not primarily by reliability limits. If TTC/TFC were reliability in nature, why would they be confined to only ATC Paths? We operate the entire system reliably to SOLs, not just the ATC Paths. 3. TTC/TFC can be less than SOLs, but not more. The amount less is at the discretion of the entity calculating the TTC/TFC. However, if TTC/TFC are reliability limits, then, IRO-005-3 R10 would require us to operate to the more limiting of the SOL or the TTC/TFC and we would be artificially constraining the transmission in real time to below the SOL at the discretion of the entity determining TTC/TFC. This would play havoc in many regions that do not currently do it this way, such as Florida which operates to SOLs, not TTCs, e.g., Florida allows real time actual flows to exceed TTCs, but not SOLs. If TTC is a reliability limit, then IRO-005-3 R10 would not allow us to continue this process. 4. FAC-011 includes consideration of a reliability margin in R3; hence, SOLs already include a true reliability margin. Since TTC/TFC must be less than an SOL, TTC/TFC already includes that reliability margin. Consequently, TRM is an additional margin for commercial considerations and is not a true reliability margin. That is, TRM is used to reduce the risk of curtailment post-contingency and is not a true reliability margin. Hence, it is clear to FMPA that TTC/TFC/TRM are commercial values, not reliability values. Interpreting them as reliability values is inconsistent with the rest of the standards and would cause harm to markets by artificially constraining real time operations. Since they are commercial values, FMPA believes that the TSP is the appropriate function to calculate these values and not the TOP. That is, the TOP determines actual reliability limits - SOLs and IROLs, then the TSP determines TTC/TFC/TRM based on the TOPs SOL calculations with discretion based on commercial considerations such as limiting risk of curtailment. And, as such, the determination of these commercial values can eventually be moved to NAESB business practice standards when NAESB is ready to develop such standards; however, such a transition is unlikely if the standard continues to be assigned to TOPs. In addition, the FERC Pro Forma OATT is clear that it is the Transmission Providers' responsibility to develop these TTC, ATC, CBM, and TRM methodologies. See Attachment C of the Pro Forma. Below quotes the FERC's Pro Forma OATT as posted on the FERC site: At 3(A): "For TTC, a Transmission Provider shall: (i) explain its definition of TTC; (ii) explain its TTC calculation methodology; (iii) list the databases used in its TTC assessments; and (iv) explain the assumptions used in its TTC assessments regarding load levels, generation dispatch, and modeling of planned and contingency outages." Within Attachment C, the Pro Forma similarly requires the Transmission Provider to explain ATC/AFC, TRM and CBM (and ETC). Hence, the standard as proposed is duplicative of other regulatory requirements. NAESB is the entity that

develops business practices to support the FERC Pro Forma OATT, and as such, they should be the entity that develops any standards related to TTC/TFC, ATC/AFC, CBM and TRM, not NERC. If TTC/TFC and TRM are left as the responsibility of the TOP, then there is a danger of the TOP and TSP each developing methodologies (TOP in accordance with NERC, TSP in accordance with the Pro Forma OATT) that contradict with each other. Bear in mind that there are cases where the TOP and TSP are not vertically integrated. How would such a conflict be resolved? FMPA understands that there may be regional differences that may call for regional variances (e.g., WECC); however, the standards are written around the SOL reliability construct with TTC/TFC being commercial in nature.

Individual

Catherine Wesley

PJM Interconnection

PJM supports the SRC's response to this question specific to their comment recommending consistency in the Purpose statement for use of the terms "available transmission system transfer capability" and "available transmission system capability".

PJM supports the MOD A project overall. It appreciates the effort to consolidate the applicable MOD standards into one standard with focus on what is required for reliability.

Individual

RoLynda Shumpert

South Carolina Electric and Gas

Agree

SERC PSS

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

1) Comments: General Comments a. Bulk-Power system (BPS) – BPS is not a defined acronym and should be taken out of standard b. Transmission Operator – has an acronym TOP and should be used throughout the standard or acronym's should be taken out and not used. c. Transmission Services Provider – has an acronym TSP and should be used throughout the standard or acronym's should be taken out and not used. d. There are several other terms that need acronyms (Planning Coordinator, Reliability Coordinator, etc.) or acronym's should be taken out and not used. 2) Specific Standard Comments a. Purpose – The term "other" in the last sentence refers to what? If you mean other planners and operators then need to qualify that planners are Transmission Services Providers and operators are Transmission Operators. There is a disconnect between the two in this last sentence. b. We appreciate the clarity SDT provided for R1.1 by the language in M1. Since the entities are audited based on the requirement rather than the measure, R1.1 should be edited to reflect the intent. 1.1 Each methodology shall describe the method used to account for the following limitations, which

are applicable in both the pre- and post-contingency state: • Facility ratings; • System voltage limits; • Transient stability limits; • Voltage stability limits; and • Other System Operating Limits (SOLs). c. M1 – There is an inconsistency between the bullets and R1. i. Third bullet states “A copy of the request and a description of the method used to perform the impact test (1.3.1) or account for the requested constraints (1.3.2)” should include 1.3.3 in the measurement such as “A copy of the request and a description of the method used to perform the impact test (1.3.1) or account for the requested constraints (1.3.2 and 1.3.3)”. d. R3 rationale – term “Load-Serving Entities (LSEs), who’s Loads” should be “Load-Serving Entities (LSEs), whose Loads” e. R3 – The term “determines” should be change to “maintains”. The TSP does not determine the CBM but acts upon and maintains the CBM request from the LSE. The RP studies and determines the amount of CBM that can be reliably justified the TSP does not run these studies. f. M3 - The term “determines” should be change to “maintains” to be consistent with R3.

Group
Seattle City Light
paul haase
Agree
Snohomish PUD