

**Compliance Questionnaire and**

**Reliability Standard Audit Worksheet**

**MOD-019-0.1— Reporting of Interruptible Demands and Direct Control Load Management**

**Registered Entity:** *(Must be completed by the Compliance Enforcement Authority)*

**NCR Number:** *(Must be completed by the Compliance Enforcement Authority)*

**Applicable Function(s): LSE, PA, TP, RP**

**Auditors:**

**Disclaimer**

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# Subject Matter Experts

Identify your company’s subject matter expert(s) responsible for this Reliability Standard. Include the person's title, organization and the requirement(s) for which they are responsible. Insert additional lines if necessary.

**Response: *(Registered Entity Response Required)***

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| --- | --- | --- | --- |
| **SME Name** | **Title** | **Organization** | **Requirement** |
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# Reliability Standard Language

**MOD-019-0.1 – Reporting of Interruptible Demands and Direct Control Load Management**

**Purpose:**

To ensure that assessments and validation of past events and databases can be performed, reporting of actual demand data is needed. Forecast demand data is needed to perform future system assessments to identify the need for system reinforcement for continued reliability. In addition, to assist in proper real-time operating, load information related to controllable Demand-Side Management programs is needed.

**Applicability:**

Load Serving Entity

Planning Authority

Transmission Provider

Resource Planner

**NERC BOT Approval Date: 10/29/2008**

**FERC Approval Date: 5/13/2009**

**Reliability Standard Enforcement Date in the United States: 5/13/2009**

**Requirement**:

1. The Load-Serving Entity, Planning Authority, Transmission Planner, and Resource Planner shall each provide annually its forecasts of interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer and winter peak system conditions to NERC, the Regional Reliability Organizations, and other entities (Load-Serving Entities, Planning Authorities, and Resource Planners) as specified by the documentation in Reliability Standard MOD-016-1\_R1.

**Describe, in narrative form, how you meet compliance with this requirement:**

***(Registered Entity Response Required)***

**Question:** Did you receive a request to provide data as specified in MOD-016-1 R1. If yes, provide details of the request.

***(Registered Entity Response Required)***

# R1 Supporting Evidence and Documentation

**Response: *(Registered Entity Response Required)***

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| --- | --- | --- | --- |
|  | **Provide the following:**  **Document Title and/or File Name, Page & Section, Date & Version** | | |
| **Title** | | **Date** | **Version** | |
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| *Audit Team: Additional Evidence Reviewed:* | |  |  | |
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***This section must be completed by the Compliance Enforcement Authority.***

**Compliance Assessment Approach Specific to MOD-019-0.1 R1**

\_\_\_\_ Verify the LSE, PA, TP, and RP each provided annually, its forecasts of interruptible demands and Direct Control Load Management (DCLM) data for at least five years and up to ten years into the future, as requested, for summer and winter peak system conditions to NERC, the RRO, and other entities (LSEs, PAs, and RPs) as specified by the documentation in Reliability Standard MOD-016-1\_R1.

**Detailed notes:**

# Supplemental Information

**Other ‑** The list of questions above is not all inclusive of evidence required to show compliance with the Reliability Standard. Provide additional information here**, as necessary that** demonstrates compliance with this Reliability Standard.

**Entity** **Response: *(Registered Entity Response)***

# Compliance Findings Summary (to be filled out by auditor)

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| **Req.** | **C** | **PV** | **OEA** | **NA** | **Statement** |
| **1** |  |  |  |  |  |

**Excerpts from FERC Orders -- For Reference Purposes Only**

**Updated Through August 2010**

**MOD-019-0.1**

**Order 693**

1274. The Commission approves MOD-019-0 as mandatory and enforceable. In addition, the Commission directs the ERO to modify MOD-019-0 as discussed below.

1275. As an initial matter, we disagree that MOD-019-0 cannot be implemented because it is dependent on MOD-016-0, which further depends on various unapproved standards. As previously stated, we direct the ERO to provide a Work Plan and compliance filing regarding the collection of information specified under related standards that are deferred, and believe there should be no difficulties complying with this Reliability Standard. We reiterate that ongoing collection of data is necessary to maintain system reliability, and approval of MOD-019-0 will help to achieve this goal. We therefore direct the ERO to use its authority pursuant to § 39.2(d) of our regulations to require users, owners and operators to provide to the Regional Entity information related to forecasts of interruptible demands and direct control load management.

1276. The Commission adopts the NOPR proposal directing the ERO to modify this standard to require reporting of the accuracy, error and bias of controllable load forecasts. This requirement will enable planners to get a more reliable picture of the amount of controllable load that is actually available, therefore allowing planners to conduct more accurate system reliability assessments. The Commission finds that controllable load can be as reliable as other resources, and therefore should also be subject to the same reporting requirements. Although we recognize that verifying load control devices and interruptible loads may be complex, we do not believe that it is overly so. Further, we believe that the ERO, through its Reliability Standards development process can develop innovative solutions to the Commission’s concern. We also note that EEI is concerned about such testing at times of peak load. We clarify that we are not requiring the testing to be conducted at peak load conditions. Consequently, we reject the proposals of EEI, FirstEnergy and International Transmission to discard the requirement for reporting of the accuracy, error and bias of controllable load forecasts.

1277. We direct the ERO to include APPA’s proposal in the Reliability Standards development process to add a new requirement to MOD-019-0 that would oblige resource planners to analyze differences between actual and forecasted demands for the five years of actual controllable load and identify what corrective actions should be taken to improve controllable load forecasting for the 10-year planning horizon.

1278. Regarding TAPS’ concern that reporting accuracy could be used as a compliance Measure, we clarify that compliance Measures for this Reliability Standard do not include accuracy as a compliance measure. Any change in this policy would be arrived at in the ERO Reliability Standards development process.

1279. Accordingly, the Commission approves MOD-019-0 as mandatory and enforceable. In addition, the Commission directs the ERO to develop a modification to MOD-019-0 through the Reliability Standards development process to require: (1) reporting of the accuracy, error and bias of controllable load forecasts and (2) analyzing differences between actual and forecasted demands for the five years of actual controllable load and identify what corrective actions should be taken to improve controllable load forecasting for the 10-year planning horizon.

**Revision History**

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| **Version** | **Date** | **Reviewers** | **Revision Description** |
| 1 | July 2010 | RSAW Working Group | New Document |
| 1 | September 2010 | NERC Legal & NERC Compliance | Added regulatory language & reviewed for formatting consistency. |
| 1 | December 2010 | QRSAW WG | Revised Findings Table, modified Supporting Evidence tables |
| 1 | January 2011 | Craig Struck | Reviewed for format consistency and content. |
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