

**Exhibit A**

**Proposed Reliability Standard**

**MOD-031-2 Clean Version**

## A. Introduction

1. **Title: Demand and Energy Data**
2. **Number: MOD-031-2**
3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.
4. **Applicability:**

### 4.1. Functional Entities:

- 4.1.1 Planning Authority and Planning Coordinator (hereafter collectively referred to as the “Planning Coordinator”)

This proposed standard combines “Planning Authority” with “Planning Coordinator” in the list of applicable functional entities. The NERC Functional Model lists “Planning Coordinator” while the registration criteria list “Planning Authority,” and they are not yet synchronized. Until that occurs, the proposed standard applies to both “Planning Authority” and “Planning Coordinator.”

- 4.1.2 Transmission Planner
- 4.1.3 Balancing Authority
- 4.1.4 Resource Planner
- 4.1.5 Load-Serving Entity
- 4.1.6 Distribution Provider

### 5. Effective Date

- 5.1. See the MOD-031-2 Implementation Plan.

### 6. Background:

To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management

performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

- R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- 1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data (“Applicable Entities”).
  - 1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).
  - 1.3.** A request to provide any or all of the following actual data, as necessary:
    - 1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.
    - 1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.
      - 1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.
    - 1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.
    - 1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any,

activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

- 1.4. A request to provide any or all of the following forecast data, as necessary:
  - 1.4.1. Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.
  - 1.4.2. Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.
  - 1.4.3. Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.
  - 1.4.4. Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.
  - 1.4.5. Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.
- 1.5. A request to provide any or all of the following summary explanations, as necessary,:
  - 1.5.1. The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.
  - 1.5.2. The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.
  - 1.5.3. How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.
  - 1.5.4. How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.
  - 1.5.5. How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.
- M1. The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.
- R2. Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.
- R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.
- R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- shall not be required to alter the format in which it maintains or uses the data;
  - shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; unless providing the requested data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements
- 4.1.** If the Applicable Entity does not provide data requested because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.
- M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Long-term Planning	Medium	N/A	N/A	N/A	The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data.
R2	Long-term Planning	Medium	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5</p>



			<p>did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>OR The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>
R3	Long-term Planning	Medium	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 75 days</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 80 days</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 85 days</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data requested prior to 91 days</p>

			from the date of request but prior to 81 days from the date of the request.	from the date of request but prior to 86 days from the date of the request.	from the date of request but prior to 91 days from the date of the request.	or more from the date of the request.
R4	Long-term Planning	Medium	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written request.</p>	<p>The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written request.</p>

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Version History**

Version	Date	Action	Change Tracking
1	May 6, 2014	Adopted by the NERC Board of Trustees	
1	February 19, 2015	FERC order approving MOD-031-1	
2	November 5, 2015	Adopted by the NERC Board of Trustees	

## Application Guidelines

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### Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### Rationale for R1:

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

#### Rationale for R2:

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

#### Rationale for R3:

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

#### Rationale for R4:

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not

## **Application Guidelines**

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require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

**MOD-031-2 Redline Version**

## A. Introduction

1. **Title:** Demand and Energy Data
2. **Number:** MOD-031-~~12~~
3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.
4. **Applicability:**

### 4.1. Functional Entities:

- 4.1.1 Planning Authority and Planning Coordinator (hereafter collectively referred to as the “Planning Coordinator”)

This proposed standard combines “Planning Authority” with “Planning Coordinator” in the list of applicable functional entities. The NERC Functional Model lists “Planning Coordinator” while the registration criteria list “Planning Authority,” and they are not yet synchronized. Until that occurs, the proposed standard applies to both “Planning Authority” and “Planning Coordinator.”

- 4.1.2 Transmission Planner
- 4.1.3 Balancing Authority
- 4.1.4 Resource Planner
- 4.1.5 Load-Serving Entity
- 4.1.6 Distribution Provider

## 5. Effective Date

~~5.1. MOD-031-1 shall become effective on the first day of the first calendar quarter that is twelve months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twelve months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.~~

5.1. See the MOD-031-2 Implementation Plan.

## 6. Background:

To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

- R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- 1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data (“Applicable Entities”).
  - 1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).
  - 1.3.** A request to provide any or all of the following actual data, as necessary:
    - 1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.
    - 1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.
      - 1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather



normalized annual peak hour actual Demand for the prior calendar year.

- 1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.
  - 1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any, activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).
- 1.4.** A request to provide any or all of the following forecast data, as necessary:
- 1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.
  - 1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.
  - 1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.
  - 1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.
  - 1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.
- 1.5.** A request to provide any or all of the following summary explanations, as necessary,:
- 1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.
  - 1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.
  - 1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.
  - 1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.

**1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.

- M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.
- R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.
- R3.** The Planning Coordinator or the Balancing Authority shall provide the data ~~collected~~listed under Requirement ~~R2~~R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.
- R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- shall not be required to alter the format in which it maintains or uses the data;
  - shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; ~~and~~unless providing the requested data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements
  - ~~shall not be required to alter the format in which it maintains or uses the data.~~
- 4.1.** If the Applicable Entity does not provide data requested ~~under this requirement~~ because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the

requesting entity specifying the data that is not being provided and on what basis.

- M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

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#### 1.4. Additional Compliance Information

None

Table of Compliance Elements

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R1	Long-term Planning	Medium	N/A	N/A	N/A	The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data.
R2	Long-term Planning	Medium	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5</p>

			<p>did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>OR The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>
R3	Long-term Planning	Medium	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data <del>collected under Requirement</del></p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data <del>collected under Requirement</del></p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data <del>collected under Requirement</del></p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data <del>collected under Requirement R2</del><u>requested</u> prior to 91 days or more</p>

			<del>R2</del> requested, but did so after 75 days from the date of request but prior to 81 days from the date of the request.	<del>R2</del> requested, but did so after 80 days from the date of request but prior to 86 days from the date of the request.	<del>R2</del> requested, but did so after 85 days from the date of request but prior to 91 days from the date of the request.	from the date of the request.
R4	Long-term Planning	Medium	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written request.</p>	<p>The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written request.</p>

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**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Version History**

Version	Date	Action	Change Tracking
1	May 6, 2014	Adopted by the NERC Board of Trustees <del>r</del>	
1	February 19, 2015	FERC order approving MOD-031-1	
<u>2</u>	<u>November 5, 2015</u>	<u>Adopted by the NERC Board of Trustees</u>	

## Application Guidelines

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### Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### Rationale for R1:

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

#### Rationale for R2:

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

#### Rationale for R3:

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

#### Rationale for R4:

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the ~~provisions outlined in Requirement R4 below~~. Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not

## Application Guidelines

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require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

**Exhibit B**  
**Implementation Plan**

## Implementation Plan

### Project 2010-04.1 Demand and Energy Data

#### Implementation Plan for MOD-031-2 – Demand and Energy Data

##### ***Approvals Required***

MOD-031-2 – Demand and Energy Data

##### ***Prerequisite Approvals***

There are no other standards that must receive approval prior to the approval of this standard.

##### ***Revisions to Glossary Terms***

N/A

##### ***Applicable Entities***

Planning Coordinator and Planning Authority

Transmission Planner

Resource Planner

Balancing Authority

Load-Serving Entity

Distribution Provider

##### ***Applicable Facilities***

N/A

##### ***Conforming Changes to Other Standards***

None

##### ***Effective Dates***

MOD-031-2 shall become effective as follows:

The later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is

required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

***Justification***

The six-month implementation period will provide sufficient time for the applicable entities to develop the necessary process to implement this standard.

***Retirements***

MOD-031-1 shall be retired at 11:59:59 p.m. of the day immediately prior to the effective date of MOD-031-2 in the particular jurisdiction in which the new standard is becoming effective.

**Exhibit D**

**Summary of Development History and Complete Record of Development**

## **Summary of Development**



## **Summary of Development History**

The development record for proposed Reliability Standard MOD-031-2 is summarized below.

### **I. Overview of the Standard Drafting Team**

When evaluating a proposed Reliability Standard, the Commission must give “due weight” to the technical expertise of the ERO.<sup>1</sup> The technical expertise of the ERO is derived from the standard drafting team. For this project, the standard drafting team consisted of industry experts, all with a diverse set of experiences. A roster of the standard drafting team members is included in Exhibit E.

### **II. Standard Development History**

#### **A. Standard Authorization Request Development**

To address the Commission’s directives in Order No. 804,<sup>2</sup> NERC revised the Standard Authorization Request (“SAR”) approved by the Standards Committee (“SC”) for the development of Reliability Standard MOD-031-1. The revised SAR was posted for comment from April 16, 2015 through May 19, 2015 and was approved by the SC on July 28, 2015.

#### **B. First Posting - Comment Period, Initial Ballot and Non-Binding Poll**

Proposed Reliability Standard MOD-031-2 was posted for a 45-day comment period from July 31, 2015 through September 18, 2015 with an initial ballot held from September 9, 2015 through September 18, 2015. The initial ballot received 85.57% quorum, and 87.36% approval. The Non-Binding Poll for VRFs and VSLs received 82.90% quorum and 89.20% of supportive opinions. There were 28 sets of comments,

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<sup>1</sup> Section 215(d)(2) of the Federal Power Act; 16 U.S.C. §824(d) (2) (2012).

<sup>2</sup> *Demand and Energy Data Standard*, Order No. 804, 150 FERC ¶ 61, 109 (2015).

including comments from approximately 93 different individuals and approximately 64 companies, representing 9 of the 10 industry segments.<sup>3</sup>

### **C. Final Ballot**

After considering stakeholder comments, no substantive revisions were made to Proposed Reliability Standard MOD-031-2 and the standard was posted for a 10-final ballot period from October 6, 2015 through October 15, 2015. The proposed Reliability Standard received 89.60% quorum and 90.01% approval.

### **D. Board of Trustees Adoption**

Proposed Reliability Standard MOD-031-2 was adopted by the NERC Board of Trustees on November 5, 2015.

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<sup>3</sup> NERC, *Consideration of Comments*, Project 2010-04.1, (November 5, 2015), available at [http://www.nerc.com/pa/Stand/Project%202010041%20MOD031%20Order%20No%20804%20Directives%20DL/2010-04\\_1\\_MOD-031\\_FERC\\_Order\\_No\\_804\\_Directive\\_MOD-031-2\\_Consideration\\_of\\_Comments\\_10062015.pdf](http://www.nerc.com/pa/Stand/Project%202010041%20MOD031%20Order%20No%20804%20Directives%20DL/2010-04_1_MOD-031_FERC_Order_No_804_Directive_MOD-031-2_Consideration_of_Comments_10062015.pdf).

## **Complete Record of Development**

## Project 2010-04.1 MOD-031 FERC Order No. 804 Directives

Related Files | 2010-04 Demand Data (MOD C)

### Status

A final ballot for **MOD-031-2 – Demand and Energy Data** concluded **8 p.m. Eastern, Thursday, October 15, 2015**. The ballot results can be accessed via the links below. The standard will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

### Background

FERC Order 804

The collection of demand projections requires coordination and collaboration between Planning Authorities (also referred to as “Planning Coordinators”), Transmission and Resource Planners, and Load-Serving Entities. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – will enhance the reliability of the BPS. Collection of actual demand and demand-side management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices. This project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.

**Standard(s) Affected:** MOD-031-1 – Demand and Energy Data

### Purpose/Industry Need

This project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.

Draft	Actions	Dates	Results	Consideration of Comments
<p><b>Draft 1</b></p> <p>MOD-031-2 Clean (19)   Redline to Last Posted (20)</p> <p>Implementation Plan (21)</p>	<p>Final Ballot Info (22) Vote</p>	<p>10/06/15 - 10/15/15</p>	<p>Summary (23) Ballot Results (24)</p>	
<p><b>Draft 1</b></p> <p>MOD-031-2 Clean (6)   Redline to Last Approved (7)</p> <p>Implementation Plan (8)</p> <p><b>Supporting Materials</b></p> <p>Unofficial Comment Form (Word) (9)</p>	<p>Initial Ballot and Non-binding Poll</p> <p>Updated Info (10) Info (11) Vote</p>	<p>09/09/15 - 09/18/15</p>	<p>Summary (14) Ballot Results (15) Non-binding Poll Results (16)</p>	
	<p>Comment Period Info (12) Submit Comments</p>	<p>07/31/15 - 09/18/15</p>	<p>Comments Received (17)</p>	<p>Consideration of Comments (18)</p>

Draft RSAW	Join Ballot Pools	07/31/15 - 08/31/15		
	Info (13) Send RSAW feedback to: <a href="mailto:RSAWfeedback@nerc.net">RSAWfeedback@nerc.net</a>	08/14/15 - 09/18/15		
SAR (1) <b>Supporting Materials</b> Unofficial Comment Form (Word) (2)	Comment Period Info (3) <a href="#">Submit Comments</a>	04/16/15 - 05/19/15	Comments Received (4)	Consideration of Comments (5)

## Standards Authorization Request Form

When completed, please email this form to:  
[sarcomm@nerc.com](mailto:sarcomm@nerc.com)

NERC welcomes suggestions to improve the reliability of the bulk power system through improved reliability standards. Please use this form to submit your request to propose a new or a revision to a NERC's Reliability Standard.

### Request to propose a new or a revision to a Reliability Standard

Title of Proposed Standard:	Demand <b>and Energy</b> Data		
Date Submitted:	<del>July 18, 2013</del> April 1, 2015		
SAR Requester Information			
Name:	Darrel Richardson		
Organization:	NERC		
Telephone:	609-613-1848	E-mail:	darrel.richardson@nerc.net
SAR Type (Check as many as applicable)			
<input type="checkbox"/> New Standard	<input checked="" type="checkbox"/> Withdrawal of existing Standard		
<input checked="" type="checkbox"/> Revision to existing Standard	<input type="checkbox"/> Urgent Action		

### SAR Information

Industry Need (What is the industry problem this request is trying to solve?):
Resolve FERC directives <b>from FERC Order 693 and Order 804</b> , incorporate lessons learned, update standards, and to incorporate initiatives such as results-based, performance-based, Paragraph 81, etc.
Purpose or Goal (How does this request propose to address the problem described above?):
<b>This is a continuation of Project 2010-04 MOD C. The revised SAR language is shown in red to ensure clarity as to the purpose of this phase of the project.</b> The pro forma standard consolidates the reliability

SAR Information
<p>components of the existing standards. <b>This phase of the project proposes to revise MOD-031-1 to resolve the two directives from FERC Order 804.</b></p>
<p>Identify the Objectives of the proposed standard’s requirements (What specific reliability deliverables are required to achieve the goal?):</p>
<p>The objectives are to address the outstanding directives from FERC Order 693 <b>and Order 804</b>, remove ambiguity from the requirements, and incorporate lessons learned.</p>
<p>Brief Description (Provide a paragraph that describes the scope of this standard action.)</p>
<p>An informal development ad hoc group is presenting a pro forma standard that consolidates the existing MOD-016-1.1, MOD-017-0.1, MOD-018-0, MOD-019-0.1 and MOD-021-1 into a single standard. The collection of demand projections requires coordination and collaboration between Planning Authorities (also referred to as “Planning Coordinators”), Transmission and Resource Planners, and Load-Serving Entities. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – will enhance the reliability of the BPS. Collection of actual demand and demand-side management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.</p> <p>The pro forma standard requirements are currently placed within a new standard, MOD-031-1. <b>This phase of the project proposes to resolve the two directives from FERC Order No. 804 to clarify (1) the obligations of the Planning Coordinator and Balancing Authority to provide data to their Regional Entity, and (2) the compliance obligations associated with requests for confidential information.</b></p>
<p>Detailed Description (Provide a description of the proposed project with sufficient details for the standard drafting team to execute the SAR. Also provide a justification for the development or revision of the standard, including an assessment of the reliability and market interface impacts of implementing or not implementing the standard action.)</p>
<p><del>Detailed description of this project can be found in the Technical White Paper of this SAR submittal package.</del> <b>This phase of the project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the Order 804 directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.</b></p>

Reliability Functions

The Standard will Apply to the Following Functions (Check each one that applies.)

<input type="checkbox"/> Regional Reliability Organization	Conducts the regional activities related to planning and operations, and coordinates activities of Responsible Entities to secure the reliability of the Bulk Electric System within the region and adjacent regions.
<input type="checkbox"/> Reliability Coordinator	Responsible for the real-time operating reliability of its Reliability Coordinator Area in coordination with its neighboring Reliability Coordinator's wide area view.
<input checked="" type="checkbox"/> Balancing Authority	Integrates resource plans ahead of time, and maintains load-interchange-resource balance within a Balancing Authority Area and supports Interconnection frequency in real time.
<input type="checkbox"/> Interchange Authority	Ensures communication of interchange transactions for reliability evaluation purposes and coordinates implementation of valid and balanced interchange schedules between Balancing Authority Areas.
<input checked="" type="checkbox"/> Planning Coordinator	Assesses the longer-term reliability of its Planning Coordinator Area.
<input checked="" type="checkbox"/> Resource Planner	Develops a >one year plan for the resource adequacy of its specific loads within a Planning Coordinator area.
<input checked="" type="checkbox"/> Transmission Planner	Develops a >one year plan for the reliability of the interconnected Bulk Electric System within its portion of the Planning Coordinator area.
<input type="checkbox"/> Transmission Service Provider	Administers the transmission tariff and provides transmission services under applicable transmission service agreements (e.g., the pro forma tariff).
<input type="checkbox"/> Transmission Owner	Owns and maintains transmission facilities.
<input type="checkbox"/> Transmission Operator	Ensures the real-time operating reliability of the transmission assets within a Transmission Operator Area.
<input checked="" type="checkbox"/> Distribution Provider	Delivers electrical energy to the End-use customer.
<input type="checkbox"/> Generator Owner	Owns and maintains generation facilities.
<input type="checkbox"/> Generator Operator	Operates generation unit(s) to provide real and reactive power.



Reliability Functions	
<input type="checkbox"/> Purchasing-Selling Entity	Purchases or sells energy, capacity, and necessary reliability-related services as required.
<input type="checkbox"/> Market Operator	Interface point for reliability functions with commercial functions.
<input checked="" type="checkbox"/> Load-Serving Entity	Secures energy and transmission service (and reliability-related services) to serve the End-use Customer.

Reliability and Market Interface Principles	
Applicable Reliability Principles (Check all that apply).	
<input checked="" type="checkbox"/>	1. Interconnected bulk power systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards.
<input checked="" type="checkbox"/>	2. The frequency and voltage of interconnected bulk power systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand.
<input checked="" type="checkbox"/>	3. Information necessary for the planning and operation of interconnected bulk power systems shall be made available to those entities responsible for planning and operating the systems reliably.
<input type="checkbox"/>	4. Plans for emergency operation and system restoration of interconnected bulk power systems shall be developed, coordinated, maintained and implemented.
<input type="checkbox"/>	5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk power systems.
<input type="checkbox"/>	6. Personnel responsible for planning and operating interconnected bulk power systems shall be trained, qualified, and have the responsibility and authority to implement actions.
<input type="checkbox"/>	7. The security of the interconnected bulk power systems shall be assessed, monitored and maintained on a wide area basis.
<input type="checkbox"/>	8. Bulk power systems shall be protected from malicious physical or cyber attacks.
Does the proposed Standard comply with all of the following Market Interface Principles?	
1. A reliability standard shall not give any market participant an unfair competitive advantage.	Enter (yes/no) Yes
2. A reliability standard shall neither mandate nor prohibit any specific market structure.	Yes
3. A reliability standard shall not preclude market solutions to achieving compliance with that standard.	Yes

**Reliability and Market Interface Principles**

<p>4. A reliability standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards.</p>	<p>Yes</p>
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**Related Standards**

Standard No.	Explanation
MOD-001-1a	Available Transmission System Capability
MOD-016-1.1	Documentation of Data Reporting Requirements for Actual and Forecast Demands, Net Energy for Load, Controllable Demand-Side Management
MOD-017-0.1	Aggregated Actual and Forecast Demands and Net Energy for Load
MOD-018-0	Treatment of Nonmember Demand Data and How Uncertainties are Addressed in the Forecasts of Demand and Net Energy for Load
MOD-019-0.1	Reporting of Interruptible Demands and Direct Control Load Management
MOD-021-1	Documentation of the Accounting Methodology for the Effects of Demand-Side Management in Demand and Energy Forecasts

**Related SARs**

SAR ID	Explanation

Related SARs

Related SARs	

Regional Variances

Region	Explanation
ERCOT	None
FRCC	None
MRO	None
NPCC	None
RFC	None
SERC	None
SPP	None
WECC	None

## Unofficial Comment Form

Project 2010-04.1 MOD-031 FERC Order No. 804  
Directives

### MOD-031-2 Standard Authorization Request

**DO NOT** use this form for submitting comments. Use the [electronic form](#) to submit comments on the Standard Authorization Request (SAR) recommendation to modify MOD-031-1 to address FERC Order No. 804 directives. Comments must be submitted by **8 p.m. Eastern Tuesday, May 19, 2015**.

Documents and information about this project are available on the [project page](#). If you have questions, contact Senior Standards Developer, [Darrel Richardson](#) (via email), or at 609-613-1848.

#### Background Information

The collection of demand projections requires coordination and collaboration between Planning Authorities (also referred to as “Planning Coordinators”), Transmission and Resource Planners, and Load-Serving Entities. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – will enhance the reliability of the BPS. Collection of actual demand and demand-side management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices. This project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.

**Questions**

1. Do you agree that MOD-031-1 Requirement R3 needs clarity regarding certain obligations to provide data to the Regional Entity? If not, please explain.

Yes:

No:

Comments:

2. Do you agree that the standard needs additional clarity regarding the obligations of an applicable entity upon receipt of a data request that seeks confidential information? If not, please explain.

Yes:

No:

Comments:

## Standards Announcement

### Project 2010-04.1 MOD-031 FERC Order No. 804 Directives Standard Authorization Request

Informal Comment Period Open through May 19, 2015

**[Commenting for this project is in the Standards Balloting & Commenting System \(SBS\)](#)**

#### **[Now Available](#)**

A 30-day informal comment period for the **Project 2010-04.1 MOD-031 FERC Order No. 804 Directives** Standard Authorization Request (SAR) is open through **8 p.m. Eastern, Tuesday, May 19, 2015**.

#### **[SBS Login, Registration, Validation and Permissions](#)**

To **comment** in the SBS, you must have a contributor, voter, or proxy role.

#### **Commenting**

Use the [electronic form](#) to submit comments on the SAR. If you experience any difficulties in using the electronic form, contact [Arielle Cunningham](#). An off-line, unofficial Word version of the comment form is posted on the [project page](#).

For information on the **Standards Development Process**, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Darrel Richardson](#) (via email) or by phone at (609) 613-1848.

North American Electric Reliability Corporation

3353 Peachtree Rd, NE

Suite 600, North Tower

Atlanta, GA 30326

404-446-2560 | [www.nerc.com](http://www.nerc.com)

# Survey Report

## Survey Details

**Name** 2010-04.1 FERC Order 804 Directive | MOD-031 SAR

**Description**

**Start Date** 4/16/2015

**End Date** 5/19/2015

**Associated Ballots**

## Survey Questions

***1. Do you agree that MOD-031-1 Requirement R3 needs clarity regarding certain obligations to provide data to the Regional Entity? If not, please explain.***

**Yes**

**No**

**2. Do you agree that the standard needs additional clarity regarding the obligations of an applicable entity upon receipt of a data request that seeks confidential information? If not, please explain.**

**Yes**

**No**

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## Responses By Question

**1. Do you agree that MOD-031-1 Requirement R3 needs clarity regarding certain obligations to provide data to the Regional Entity? If not, please explain.**

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**



Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

Dominion believes the current requirement clearly states which entities must provide data to the Regional Entity when requested. However, we also acknowledge the FERC directive to develop a modification to clarify certain obligations to provide data to the Regional Entity.

**Document Name:**

Likes: 0

Dislikes: 0

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**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

*The SRC agrees that the Regions and the ERO should have access to the R1-defined data whether or not the data was obtained as a result of an ad hoc request.*

*The SRC also suggests that any revised requirement be clear that the*

*obligation is specific to the data defined in R1.3 to R1.5. Linking R3 to the specific data in R1 would clarify that the ERO and the Regions should not be inundated with specialized or ad hoc data that are unrelated to the ERO and Regional studies.*

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC**

**Selected Answer:** Yes

**Answer Comment:**

**We agree that the Responsible Entities should comply with the data request by the REs, but suggest that the data to be provided should be confined to those listed under R1 only rather than any data.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Gul Khan - Oncor Electric Delivery - 2 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: No

**Answer Comment:**

R3 clearly states the PC or BA is to provide to the RE **only** the data collected under Requirement R2.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the SRC's comments in response to this survey.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

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**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

The SDT developing the changes should consider the data request requirements of TOP-003-2 – Operational Reliability Data, R2 for possible duplication. TOP-003-2, R2 requires the BA to create a documented specification for data collection.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**faranak sarbaz - Los Angeles Department of Water and Power - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer: No

**Answer Comment:**

AEP believes that MOD-31-1 R3 is sufficiently clear as written.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

As commented on during the development of MOD-031-1, we believe that Requirement R3 should be removed from the standard. The authority of the ERO Enterprise to request demand and energy data for the purpose of preparing reliability assessments is sufficiently addressed by Sections

1600 and 800 of the NERC Rules of Procedure (ROP) -- at least within the portions of the United States that are described in 18 CFR 39.2(a). The procedural steps outlined in section 1602 of the NERC ROP are the preferred method for NERC (and Regional Entities) to follow when it needs to collect data from registered entities. Within this process, NERC must "make its case" when requesting data or information by providing a proposed request to FERC (for informational purposes) in advance of posting publicly, posting the proposed request for a forty-five (45) day public comment period, evaluating any comments received, making revisions following receipt of comments as deemed appropriate, and submitting the proposed request to the NERC Board of Trustees for authorization. Section 1602, Part 2.2.1 also describes the minimum information that NERC shall provide for a proposed request. This process provides greater transparency for registered entities and other stakeholders.

Our position is that reliability assessments prepared by the ERO Enterprise, while informative, do not pose a significant threat to reliability of the Bulk-Power System in their absence. Provisions for NERC to request, and registered entities to provide, demand and energy data are therefore appropriately covered in the NERC ROP and should not be part of a Reliability Standard requirement. Therefore, our recommendation for addressing this FERC directive is to remove Requirement R3 from MOD-031-1.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Teresa Czyz - Georgia Transmission Corporation - 1 - SERC**

Selected Answer: No



**Answer Comment:**

GTC agrees with the comments provided by ACES Power:

We believe that Requirement R3 is a classic Paragraph 81 requirement and should be retired in its entirety. Requirement R3 clearly meets criteria B1 – Administrative and B2 – Data Collection/Data Retention. The requirement meets criteria B1 and B2 because it is administrative in nature, requires the documentation of prior events (i.e. historical load) and “should be collected via some other method under NERC’s rule and processes.” NERC has a whole host of other data collection processes available via the Rules of Procedure (ROP) that are more efficient because they do not require compliance monitoring. As an example, a standing ROP Section 1600 data request could be used for NERC to gather load forecast data from BAs and PCs. Furthermore, there is already a precedent to use this data collection tool in the collection of TADS and GADS data. The bottom line is that this data is easily available to the Regional Entities without the need for Requirement R3.

While we understand that NERC must comply with the FERC directive to clarify R3, FERC allows alternative approaches that address their concerns that are equally as efficient and effective. Striking the requirement in its entirety with an explanation in the filing regarding how NERC and the Regional Entities use the ROP section 1600 data requests to gather demand and energy data to support NERC’s development of seasonal and long-term reliability assessments would clearly meet an equally efficient and effective alternative. In fact, it is a superior approach to gathering the data because it does not involve compliance monitoring staff resulting in efficiency gains. This would especially hold true given that the Regional Entities or NERC have always been able to gather timely demand and energy data for the development of reliability assessments. Is Requirement R3’s purpose to document part of the seasonal and long-term reliability assessment processes?

To further support the retirement of Requirement R3, we point to

NERC's initiatives to focus on the biggest risks to reliability of the Bulk Power System (BPS). NERC has developed risk elements to assist each Regional Entity in assessing risk and data submittals are categorized as low risk. We cannot support the revision of R3, as we feel that not only does it meet P81 criteria and there are equally efficient and effective alternatives to the requirement, but also it would be a low risk element that would not be monitored anyway. We urge the standard drafting teams to review requirements under the new approach of risk based compliance monitoring and enforcement to determine if the requirements that are being proposed will mitigate moderate to high risks to the BPS. In this case, R3 will not mitigate moderate or high risks and should be retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

If an auditor were to choose to penalize an entity for obtaining the data through some method less burdensome than an R1 data request, that would be ridiculous. But common sense does not always prevail, so I suppose that means that clarification is necessary. MOD timelines should be flexible/recognize when data requests become subject to corporate confidentiality procedures.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We agree that the Responsible Entities should comply with the data request by the Regional Entities, but suggest that the data to be provided should be confined to that listed under R1 only rather than any data. The data request should be limited to that data necessary to support NERC's development of seasonal and long-term reliability assessments [FERC Order 804 paragraph 18].

The detailed description of the SAR says a modification of requirement R3 will occur. The SAR should allow for a separate requirement to be developed. This may be necessary because the data collection process may be via an alternative collection mechanism other than R2.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Duke Energy agrees that clarification is needed.**

**Document Name:**

Likes: 0

Dislikes: 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

We believe that Requirement R3 is a classic Paragraph 81 requirement and should be retired in its entirety. Requirement R3 clearly meets criteria B1 – Administrative and B2 – Data Collection/Data Retention. The requirement meets criteria B1 and B2 because it is administrative in nature, requires the documentation of prior events (i.e. historical load) and “should be collected via some other method under NERC’s rule and processes.” NERC has a whole host of other data collection processes available via the Rules of Procedure (ROP) that are more efficient because they do not require compliance monitoring. As an

example, a standing ROP Section 1600 data request could be used for NERC to gather load forecast data from BAs and PCs. Furthermore, there is already a precedent to use this data collection tool in the collection of TADS and GADS data. The bottom line is that this data is easily available to the Regional Entities without the need for Requirement R3.

While we understand that NERC must comply with the FERC directive to clarify R3, FERC allows alternative approaches that address their concerns that are equally as efficient and effective. Striking the requirement in its entirety with an explanation in the filing regarding how NERC and the Regional Entities use the ROP section 1600 data requests to gather demand and energy data to support NERC's development of seasonal and long-term reliability assessments would clearly meet an equally efficient and effective alternative. In fact, it is a superior approach to gathering the data because it does not involve compliance monitoring staff resulting in efficiency gains. This would especially hold true given that the Regional Entities or NERC have always been able to gather timely demand and energy data for the development of reliability assessments. Is Requirement R3's purpose to document part of the seasonal and long-term reliability assessment processes?

To further support the retirement of Requirement R3, we point to NERC's initiatives to focus on the biggest risks to reliability of the Bulk Power System (BPS). NERC has developed risk elements to assist each Regional Entity in assessing risk and data submittals are categorized as low risk. We cannot support the revision of R3, as we feel that not only does it meet P81 criteria and there are equally efficient and effective alternatives to the requirement, but also it would be a low risk element that would not be monitored anyway. We urge the standard drafting teams to review requirements under the new approach of risk based compliance monitoring and enforcement to determine if the requirements that are being proposed will mitigate moderate to high risks to the BPS. In this case, R3 will not mitigate moderate or high risks and should be retired.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

Texas RE recommends providing clarity in order to deter entities from activities that do not support reliability.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Chris Scanlon - Exelon - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We would suggest to the drafting team to include in Requirement R3 some alternative language suggesting how to handling 'confidential' information appropriately and its listed as followed: 'The Planning Coordinator or the Balancing Authority shall provide the data collected (public and confidential should be handle appropriately) under Requirement R2 to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties'. Also, we would like the drafting team to add some clarity on whether the data request is applicable to the entities specific Regional Entity or can any Regional Entity request the data from the applicable Planning Coordinator or Balancing Authority?

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer: No

**Answer Comment:**

BPA believes one does not need to give confidential information regarding individual entities when providing details about expected future conditions when looking at the entire electrical system. There may be times when the expected outcome is large enough that individual entities activities can be discerned. Given that planning must be done with confidential information, if clarifying language were provided, BPA suggests that it limits distribution of the data by the receiving entity and does not limit what is communicated - - or in other words, language that indicates all details or communication of the information must be directed to the organization that initiated the document.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

Requirement 3 has sufficient clarity

**Document Name:**



**Likes:** 0

**Dislikes:** 0

---

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

***2. Do you agree that the standard needs additional clarity regarding the obligations of an applicable entity upon receipt of a data request that seeks confidential information? If not, please explain.***

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

Error: Subreport could not be shown.

Selected Answer: No

**Answer Comment:**

Dominion believes that NERC's Rules of Procedure, Section 1500 adequately addresses this.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

*The SRC submits that Requirements R2 and R4 should be revised to provide that the requested data shall be returned to the Applicable Entity subject confidentiality requirements and agreements. This clarification would ensure that entities explore all possible avenues for provision of data that could be deemed confidential prior to exercising its right to refuse provision under Requirement 4.1.*

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Gul Khan - Oncor Electric Delivery - 2 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: No

**Answer Comment:**

CPS Energy believes that 4.1 provides the Applicable Entity sufficient rights to refuse to provide the data under 1) failure of the requesting entity to provide a "demonstrated need" for the data or 2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**

ERCOT supports the SRC's comments in response to this survey.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**faranak sarbaz - Los Angeles Department of Water and Power - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Thomas Foltz - AEP - 5 -**

Selected Answer: No

**Answer Comment:**

MOD-031-1 replaces a number of other MOD standards where the topic of confidential information was not explicitly addressed. AEP believes that MOD-031-1 R4.1 is sufficiently clear as written in regards to the obligations of an applicable entity that receives a request for potentially confidential information.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

In light of our recommendation to remove Requirement R3 from the



MOD-031 Reliability Standard (see response to question #1), the emphasis of the standard will primarily be directed at the authority of the Planning Coordinator or Balancing Authority to request demand and energy data from the other applicable entities (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider) for the purpose of supporting reliability studies and assessments that are performed by the Planning Coordinator or Balancing Authority. If there are no pre-existing agreements that address data confidentiality between the requesting entity (Planning Coordinator or Balancing Authority) and the submitting entity (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider), we can understand that this may be a cause of concern with the submitting entity (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider).

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Teresa Czyz - Georgia Transmission Corporation - 1 - SERC**

**Selected Answer:** Yes

**Answer Comment:**

Again, GTC agrees with the comments provided by ACES Power:

We agree additional clarity is needed and recommend removing redundancies in R4. First, R4 should be clarified so that no Resource Planner (RP) can request energy and demand data from another RP. There simply is no situation in which one RP needs another RP's data. This is a FERC standards of conduct issue as it deals with competition between RPs. Second, R4 should not include the PC and BA

as requesting entities since they will already be requesting data via R1. These two steps alone will eliminate the majority of the ambiguity and redundancy.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

I agree that confidential information disclosures require clarity in light of corporate customer data protection policies and the potential impact resolution of a policy compliant response has on the information request time requirements identified in the MOD. However, with requests at system level, conflicts occurrences would be an infrequent exception.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

**Duke Energy agrees that clarification is needed.**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**

We agree additional clarity is needed and recommend removing redundancies in R4. First, R4 should be clarified so that no Resource Planner (RP) can request energy and demand data from another RP. There simply is no situation in which one RP needs another RP's data. This is a FERC standards of conduct issue as it deals with competition between RPs. Second, R4 should not include the PC and BA as requesting entities since they will already be requesting data via R1. These two steps alone will eliminate the majority of the ambiguity and redundancy.

**Document Name:**

Likes: 0

Dislikes: 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

Texas RE recommends providing clarity in order to deter entities from activities that do not support reliability.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Chris Scanlon - Exelon - 1 -**

Selected Answer: No

**Answer Comment:**  
Exelon doesn't think the requirement needs clarification.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Error: Subreport could not be shown.

Selected Answer: Yes

**Answer Comment:**  
We agree there should be some type of clarity added to the standard in

reference to confidential information. At this point, the current language doesn't suggest the proper handling of confidential information by any of the applicable entities. We would suggest addressing the confidential piece in Requirement R2 where the applicable entities are requesting this type of data should verify potential confidential information and the entity providing this data marking the information as such 'confidential' so there is no confusion on how this data should be handled. We also suggest to the drafting team to mention in the requirement that the data being requested is pertaining to EIA-411 and this connection needs to be re-establish on what type of data is being requested.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** No

**Answer Comment:**

BPA believes to properly plan you must provide some confidential information generically.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:** No additional clarity is needed.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

---

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

## Consideration of Comments

**Project Name:** 2010-04.1 FERC Order 804 Directive | MOD-031 SAR

**Comment Period Start Date:** 4/16/2015

**Comment Period End Date:** 5/19/2015



**The Industry Segments are:**

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Full Name	Entity Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Region	Group Member Segment(s)
Jason Marshall	ACES Power Marketing	6	MRO,WECC,TRE,SERC,SPP ,RFC	ACES Standards Collaborators	Bob Solomon	Hoosier Energy	RFC	1
					Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
					Ginger Mercier	Prairie Power	SERC	1,3
					James Manning	North Carolina Electric Membership Corporation	SERC	3,4,5
					Ryan Strom	Buckeye Power	RFC	3,4,5

					Michael Brytowski	Great River Energy	MRO	1,3,5,6
					Shari Heino	Brazos Electric Power Cooperative	TRE	1,5
					Amber Skillern	East Kentucky Power Cooperative	SERC	1,3
					Bill Watson	Old Dominion Electric Cooperative	SERC	3,4
					Bill Watson	Old Dominion Electric Cooperative	SERC	3,4
Kaleb Brimhall	Colorado Springs Utilities	5		Colorado Springs Utilities	Shawna Speer	Colorado Springs Utilities	WECC	1
					Charlie Morgan			3
					Shannon Fair			6
					Kaleb Brimhall			5
Louis Slade	Dominion - Dominion Resources, Inc.	6		Dominion NCP	Mike Garton	NERC Compliance Policy	NPCC	5,6
					Randi Heise			SERC

					Connie Lowe		SERC	1,3,5,6
					Louis Slade		RFC	5,6
Michael Lowman	Duke Energy	1,3,5,6	FRCC,SERC,RFC	Mike Lowman on Behalf of Duke Energy	Doug Hils	Duke Energy	RFC	1
					Lee Schuster		FRCC	3
					Dale Goodwine		SERC	5
					Greg Cecil		RFC	6
Emily Rousseau	MRO	1,2,3,4,5,6	MRO	MRO-NERC Standards Review Forum (NSRF)	Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
					Amy Casucelli	Xcel Energy		1,3,5,6
					Chuck Lawrence	American Transmission Company		1
					Chuck Wicklund	Otter Tail Power Company		1,3,5
					Theresa Allard	Minnkota Power Cooperative, Inc		1,3,5,6
					Dave Rudolph	Basin Electric Power Cooperative		1,3,5,6
					Kayleigh Wilkerson	Lincoln Electric System		1,3,5,6

					Jodi Jenson	Western Area Power Administration		1,6
					Larry Heckert	Alliant Energy		4
					Mahmood Safi	Omaha Public Utility District		1,3,5,6
					Marie Knox	Midwest ISO Inc.		2
					Mike Brytowski	Great River Energy		1,3,5,6
					Randi Nyholm	Minnesota Power		1,5
					Scott Nickels	Rochester Public Utilities		4
					Terry Harbour	MidAmerican Energy Company		1,3,5,6
					Tom Breene	Wisconsin Public Service Corporation		3,4,5,6
					Tony Eddleman	Nebraska Public Power District		1,3,5
Lee Pedowicz	Northeast Power	10	NPCC	NPCC-- Project 2010-	Alan Adamson	New York State	NPCC	10

Coordinating Council	04.1 MOD-031	Reliability Council, LLC			
		David Burke		Orange and Rockland Utilities Inc.	3
		Greg Campoli		New York Independent System Operator	2
		Sylvain Clermont		Hydro-Quebec TransEnergie	1
		Kelly Dash		Consolidated Edison Co. of New York, Inc.	1
		Gerry Dunbar		Northeast Power Coordinating Council	10
		Kathleen Goodman		ISO - New England	2
		Mark Kenny		Northeast Utilities	1
		Helen Lainis		Independent Electricity System Operator	2

					Alan MacNaughton	New Brunswick Power Corporation		9
					Paul Malozewski	Hydro One Networks Inc.		1
					Bruce Metruck	New York Power Authority		6
					Lee Pedowicz	Northeast Power Coordinating Council		10
					Robert Pellegrini	The United Illuminating Company		1
					Si Truc Phan	Hydro-Quebec TransEnergie		1
					David Ramkalawan	Ontario Power Generation, Inc.		5
					Brian Robinson	Utility Services		8
					Wayne Sipperly	New York Power Authority		5

					Edward Bedder	Orange and Rockland Utilities Inc.		1
					Peter Yost	Consolidated Edison Co. of New York, Inc.		3
					Michael Jones	National Grid		1
					Brian Shanahan	National Grid		1
					Silvia Parada Mitchell	NextEra Energy, LLC		5
					Michael Forte	Consolidated Edison Co. of New York, Inc.		1
					Glen Smith	Entergy Services, Inc.		5
					Brian O'Boyle	Consolidated Edison Co. of New York, Inc.		8
					RuiDa Shu	Northeast Power Coordinating Council		10

					Connie Lowe	Dominion Resources Services, Inc.		5
Albert DiCaprio	PJM Interconnection, L.L.C.	2	RFC	ISO Standards Review Committee	Charles Yeung	SPP	SPP	2
					Ben Li	IESO	NPCC	
					Mark Holman	PJM	RFC	
					Kathleen Goodman	ISONE	NPCC	
					Greg Campoli	NYISO	NPCC	
					Christina V. Bigelow	ERCOT	TRE	
					Ali Miremadi	CAISO	WECC	
					Terry Bilke	MISO	RFC	
Shannon Mickens	Southwest Power Pool, Inc. (RTO)	2	SPP	SPP Standards Review Group	Shannon Mickens	Southwest Power Pool Inc.	SPP	2
					Joe Fultz	Grand River Dam Authority	SPP	1
					Kevin Giles	Westar Energy Inc	SPP	1,3,5,6
					James Nail	City of Independence, Missouri	SPP	3,5



					Dona Parks	Grand River Dam Authority		1
					Jason Smith	Southwest Power Pool Inc		2
					mike Kidwell	Empire District Electric Company		1,3,5
					Sean Simpson	Board of Public Utilities, City of McPherson	NA - Not Applicable	NA - Not Applicable

**1. Do you agree that MOD-031-1 Requirement R3 needs clarity regarding certain obligations to provide data to the Regional Entity? If not, please explain.**

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

Likes: 0

Dislikes: 0

---

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

Selected Answer: No

**Answer Comment:**

Dominion believes the current requirement clearly states which entities must provide data to the Regional Entity when requested. However, we also acknowledge the FERC directive to develop a modification to clarify certain obligations to provide data to the

Regional Entity.

**Response:** The SDT thanks you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

**Selected Answer:** Yes

**Answer Comment:**

*The SRC agrees that the Regions and the ERO should have access to the R1-defined data whether or not the data was obtained as a result of an ad hoc request.*

*The SRC also suggests that any revised requirement be clear that the obligation is specific to the data defined in R1.3 to R1.5. Linking R3 to the specific data in R1 would clarify that the ERO and the Regions should not be inundated with specialized or ad hoc data that are unrelated to the ERO and Regional studies.*

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

Dislikes: 0

---

**Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC**

Selected Answer: Yes

**Answer Comment:**

**We agree that the Responsible Entities should comply with the data request by the REs, but suggest that the data to be provided should be confined to those listed under R1 only rather than any data.**

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

Likes: 0

Dislikes: 0

---

**Gul Khan - Oncor Electric Delivery - 2 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Response:**

Likes: 0

**Dislikes:** 0

---

**Brian Bartos - CPS Energy - 3 -**

Selected Answer: No

**Answer Comment:**  
R3 clearly states the PC or BA is to provide to the RE **only** the data collected under Requirement R2.

**Response:** The SDT thanks you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

Selected Answer: Yes

**Answer Comment:**  
ERCOT supports the SRC's comments in response to this survey.

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

**Dislikes:** 0

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Selected Answer:** Yes

**Answer Comment:**

The SDT developing the changes should consider the data request requirements of TOP-003-2 – Operational Reliability Data, R2 for possible duplication. TOP-003-2, R2 requires the BA to create a documented specification for data collection.

**Response:**

The entire scope of the data that can be requested is within the standard and documented within the data request prepared pursuant to Requirement R1.

**Likes:** 0

**Dislikes:** 0

**faranak sarbaz - Los Angeles Department of Water and Power - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** No

**Answer Comment:**

AEP believes that MOD-31-1 R3 is sufficiently clear as written.

**Response:** The SDT thanks you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

**Selected Answer:** Yes

**Answer Comment:**

**Response:**



**Likes:** 0

**Dislikes:** 0

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**

As commented on during the development of MOD-031-1, we believe that Requirement R3 should be removed from the standard. The authority of the ERO Enterprise to request demand and energy data for the purpose of preparing reliability assessments is sufficiently addressed by Sections 1600 and 800 of the NERC Rules of Procedure

(ROP) -- at least within the portions of the United States that are described in 18 CFR 39.2(a). The procedural steps outlined in section 1602 of the NERC ROP are the preferred method for NERC (and Regional Entities) to follow when it needs to collect data from registered entities. Within this process, NERC must “make its case” when requesting data or information by providing a proposed request to FERC (for informational purposes) in advance of posting publicly, posting the proposed request for a forty-five (45) day public comment period, evaluating any comments received, making revisions following receipt of comments as deemed appropriate, and submitting the proposed request to the NERC Board of Trustees for authorization. Section 1602, Part 2.2.1 also describes the minimum information that NERC shall provide for a proposed request. This process provides greater transparency for registered entities and other stakeholders.

Our position is that reliability assessments prepared by the ERO Enterprise, while informative, do not pose a significant threat to reliability of the Bulk-Power System in their absence. Provisions for NERC to request, and registered entities to provide, demand and energy data are therefore appropriately covered in the NERC ROP and should not be part of a Reliability Standard requirement. Therefore, our recommendation for addressing this FERC directive is to remove Requirement R3 from MOD-031-1.

**Response:**

The SDT concluded that a standard was necessary. The standard provides a more efficient and enforceable mechanism for NERC and the Regional Entities to obtain Demand data from all applicable registered entities across the entire continent. Because certain Canadian provinces have adopted only select portions of the NERC Rules of Procedure, a standard is necessary to ensure that NERC and the Regional Entities has the authority to collect the necessary data from all applicable registered entities. The data to be collected under the standard is necessary for the ERO to conduct its reliability assessments, such as the Long Term Reliability Assessment.

**Likes:**

0

Dislikes: 0

---

**Teresa Czyz - Georgia Transmission Corporation - 1 - SERC**

Selected Answer: No

**Answer Comment:**

GTC agrees with the comments provided by ACES Power:

We believe that Requirement R3 is a classic Paragraph 81 requirement and should be retired in its entirety. Requirement R3 clearly meets criteria B1 – Administrative and B2 – Data Collection/Data Retention. The requirement meets criteria B1 and B2 because it is administrative in nature, requires the documentation of prior events (i.e. historical load) and “should be collected via some other method under NERC’s rule and processes.” NERC has a whole host of other data collection processes available via the Rules of Procedure (ROP) that are more efficient because they do not require compliance monitoring. As an example, a standing ROP Section 1600 data request could be used for NERC to gather load forecast data from BAs and PCs. Furthermore, there is already a precedent to use this data collection tool in the collection of TADS and GADS data. The bottom line is that this data is easily available to the Regional Entities without the need for Requirement R3.

While we understand that NERC must comply with the FERC directive to clarify R3, FERC allows alternative approaches that address their concerns that are equally as efficient and effective. Striking the requirement in its entirety with an explanation in the filing regarding how NERC and the Regional Entities use the ROP section 1600 data requests to gather demand and energy data to support NERC’s development of seasonal and long-term reliability assessments would clearly meet an equally efficient and effective alternative. In fact, it is a superior approach to gathering the data because it does not involve compliance monitoring staff resulting in efficiency gains. This would especially hold true given that the Regional Entities or NERC have always been able to gather timely demand and energy data for the development of reliability assessments. Is Requirement R3’s purpose to document part of the seasonal and long-

term reliability assessment processes?

To further support the retirement of Requirement R3, we point to NERC's initiatives to focus on the biggest risks to reliability of the Bulk Power System (BPS). NERC has developed risk elements to assist each Regional Entity in assessing risk and data submittals are categorized as low risk. We cannot support the revision of R3, as we feel that not only does it meet P81 criteria and there are equally efficient and effective alternatives to the requirement, but also it would be a low risk element that would not be monitored anyway. We urge the standard drafting teams to review requirements under the new approach of risk based compliance monitoring and enforcement to determine if the requirements that are being proposed will mitigate moderate to high risks to the BPS. In this case, R3 will not mitigate moderate or high risks and should be retired.

**Response:**

The SDT concluded that a standard was necessary. The standard provides a more efficient and enforceable mechanism for NERC and the Regional Entities to obtain Demand data from all applicable registered entities across the entire continent. Because certain Canadian provinces have adopted only select portions of the NERC Rules of Procedure, a standard is necessary to ensure that NERC and the Regional Entities has the authority to collect the necessary data from all applicable registered entities. The data to be collected under the standard is necessary for the ERO to conduct its reliability assessments, such as the Long Term Reliability Assessment.

**Likes:** 0

**Dislikes:** 0

---

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

If an auditor were to choose to penalize an entity for obtaining the data through some method less burdensome than an R1 data request, that would be ridiculous. But common sense does not always prevail, so I suppose that means that clarification is necessary. MOD timelines should be flexible/recognize when data requests become subject to corporate confidentiality procedures.

**Response:**

The SDT has modified Requirement R3 to clearly state that an entity has to respond to a request from its Regional Entity regardless of how the data is collected. If there are known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

Likes: 0

Dislikes: 0

---

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Selected Answer: Yes

**Answer Comment:**

We agree that the Responsible Entities should comply with the data request by the Regional Entities, but suggest that the data to be provided should be confined to that listed under R1 only rather than any data. The data request should be limited to that data necessary to support NERC's development of seasonal and long-term reliability assessments [FERC Order 804 paragraph 18].

The detailed description of the SAR says a modification of requirement R3 will occur. The SAR should allow for a separate requirement to be developed. This may be necessary because the data collection process may be via an alternative collection mechanism other than R2.

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Selected Answer:** Yes

**Answer Comment:**  
Duke Energy agrees that clarification is needed.

**Response:** The SDT agrees with your comment and has made the corresponding modifications.

**Likes:** 0

**Dislikes:** 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

Selected Answer: No

**Answer Comment:**

We believe that Requirement R3 is a classic Paragraph 81 requirement and should be retired in its entirety. Requirement R3 clearly meets criteria B1 – Administrative and B2 – Data Collection/Data Retention. The requirement meets criteria B1 and B2 because it is administrative in nature, requires the documentation of prior events (i.e. historical load) and “should be collected via some other method under NERC’s rule and processes.” NERC has a whole host of other data collection processes available via the Rules of Procedure (ROP) that are more efficient because they do not require compliance monitoring. As an example, a standing ROP Section 1600 data request could be used for NERC to gather load forecast data from BAs and PCs. Furthermore, there is already a precedent to use this data collection tool in the collection of TADS and GADS data. The bottom line is that this data is easily available to the Regional Entities without the need for Requirement R3.

While we understand that NERC must comply with the FERC directive to clarify R3, FERC allows alternative approaches that address their concerns that are equally as efficient and effective. Striking the requirement in its entirety with an explanation in the filing regarding how NERC and the Regional Entities use the ROP section 1600 data requests to gather demand and energy data to support NERC’s development of seasonal and long-term reliability assessments would clearly meet an equally efficient and effective alternative. In fact, it is a superior approach to gathering the data because it does not involve compliance monitoring staff resulting in efficiency gains. This would especially hold true given that the Regional Entities or NERC have always been able to gather timely demand and energy data for the development of reliability assessments. Is Requirement R3’s purpose to document part of the seasonal and long-term reliability assessment processes?

To further support the retirement of Requirement R3, we point to NERC's initiatives to focus on the biggest risks to reliability of the Bulk Power System (BPS). NERC has developed risk elements to assist each Regional Entity in assessing risk and data submittals are categorized as low risk. We cannot support the revision of R3, as we feel that not only does it meet P81 criteria and there are equally efficient and effective alternatives to the requirement, but also it would be a low risk element that would not be monitored anyway. We urge the standard drafting teams to review requirements under the new approach of risk based compliance monitoring and enforcement to determine if the requirements that are being proposed will mitigate moderate to high risks to the BPS. In this case, R3 will not mitigate moderate or high risks and should be retired.

**Response:**

The SDT concluded that a standard was necessary. The standard provides a more efficient and enforceable mechanism for NERC and the Regional Entities to obtain Demand data from all applicable registered entities across the entire continent. Because certain Canadian provinces have adopted only select portions of the NERC Rules of Procedure, a standard is necessary to ensure that NERC and the Regional Entities has the authority to collect the necessary data from all applicable registered entities. The data to be collected under the standard is necessary for the ERO to conduct its reliability assessments, such as the Long Term Reliability Assessment.

**Likes:** 0

**Dislikes:** 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** Yes



**Answer Comment:**

Texas RE recommends providing clarity in order to deter entities from activities that do not support reliability.

**Response:**

Requested area’s regional entity, PC or BA should not be requesting any data for any other purposes than reliability. Regional Entity bylaws and delegation agreements are limited to reliability needs. The concerns with other entities requesting data is covered in Requirement R4.

**Likes:** 0

**Dislikes:** 0

**Chris Scanlon - Exelon - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP**

Selected Answer: Yes

**Answer Comment:**

We would suggest to the drafting team to include in Requirement R3 some alternative language suggesting how to handling 'confidential' information appropriately and its listed as followed: 'The Planning Coordinator or the Balancing Authority shall provide the data collected (public and confidential should be handle appropriately) under Requirement R2 to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties'. Also, we would like the drafting team to add some clarity on whether the data request is applicable to the entities specific Regional Entity or can any Regional Entity request the data from the applicable Planning Coordinator or Balancing Authority?

**Response:**

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500).

The SDT has also modified Requirement R3 to address your issue concerning the specific Regional Entity.

Likes: 0

Dislikes: 0

---

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

Selected Answer:

No

**Answer Comment:**

BPA believes one does not need to give confidential information regarding individual entities when providing details about expected future conditions when looking at the entire electrical system. There may be times when the expected outcome is large enough that individual entities activities can be discerned. Given that planning must be done with confidential information, if clarifying language were provided, BPA suggests that it limits distribution of the data by the receiving entity and does not limit what is communicated - - or in other words, language that indicates all details or communication of the information must be directed to the organization that initiated the document.

**Response:**

The SDT has modified Requirement R3 to clearly state that an entity has to respond to a request from its Regional Entity regardless of how the data is collected.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500).

If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:**

0

**Dislikes:**

0

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:** Requirement 3 has sufficient clarity

**Response:** The SDT thanks you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**2. Do you agree that the standard needs additional clarity regarding the obligations of an applicable entity upon receipt of a data request that seeks confidential information? If not, please explain.**

**John Fontenot - Bryan Texas Utilities - 1 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

Likes: 0

Dislikes: 0

---

**Louis Slade - Dominion - Dominion Resources, Inc. - 6 -**

Selected Answer: No

**Answer Comment:**

Dominion believes that NERC's Rules of Procedure, Section 1500 adequately addresses this.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

**Selected Answer:** Yes

**Answer Comment:**

*The SRC submits that Requirements R2 and R4 should be revised to provide that the requested data shall be returned to the Applicable Entity subject confidentiality requirements and agreements. This clarification would ensure that entities explore all possible avenues for provision of data that could be deemed confidential prior to exercising its right to refuse provision under Requirement 4.1.*

**Response:** The SDT modified Requirement R4 to provide additional clarity regarding confidentiality. The SDT has also added language to the rationale for Requirement R4 to further explain the applicability of confidentiality.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to

the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

---

**Mark Wilson - Independent Electricity System Operator - NA - Not Applicable - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Gul Khan - Oncor Electric Delivery - 2 - TRE**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Brian Bartos - CPS Energy - 3 -**

**Selected Answer:** No

**Answer Comment:**

CPS Energy believes that 4.1 provides the Applicable Entity sufficient rights to refuse to provide the data under 1) failure of the requesting entity to provide a "demonstrated need" for the data or 2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** Yes



**Answer Comment:**

ERCOT supports the SRC's comments in response to this survey.

**Response:**

The SDT modified Requirement R4 to provide additional clarity regarding confidentiality. The SDT has also added language to the rationale for Requirement R4 to further explain the applicability of confidentiality.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

**Likes:** 0

**Dislikes:** 0

---

**Kathleen Black - DTE Energy - 3,4,5 - RFC**

Selected Answer: Yes

**Answer Comment:****Response:**

**Likes:** 0

**Dislikes:** 0

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**faranak sarbaz - Los Angeles Department of Water and Power - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** No

**Answer Comment:**

MOD-031-1 replaces a number of other MOD standards where the topic of confidential information was not explicitly addressed. AEP believes that MOD-031-1 R4.1 is sufficiently clear as written in regards to the obligations of an applicable entity that receives a request for potentially confidential information.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

**Kaleb Brimhall - Colorado Springs Utilities - 5 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

Likes: 0

Dislikes: 0

---

**Dennis Chastain - Tennessee Valley Authority - 1,3,5,6 - SERC**

Selected Answer: Yes

**Answer Comment:**

In light of our recommendation to remove Requirement R3 from the MOD-031 Reliability Standard (see response to question #1), the emphasis of the standard will primarily be directed at the authority of the Planning Coordinator or Balancing Authority to request demand and energy data from the other applicable entities (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider) for the purpose of supporting reliability studies and assessments that are performed by the Planning Coordinator or Balancing Authority. If there are no pre-existing agreements that address data confidentiality between the requesting entity (Planning Coordinator or Balancing Authority) and the submitting entity (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider), we can understand that this may be a cause of concern with the submitting entity (Transmission Planner, Resource Planner, Load-Serving Entity, and Distribution Provider).

**Response:**

The SDT disagrees with your comment concerning Requirement R3. Please refer to our response to your comment for question #1.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

Likes: 0

Dislikes: 0

---

**Teresa Czyz - Georgia Transmission Corporation - 1 - SERC**

Selected Answer: Yes

**Answer Comment:**

Again, GTC agrees with the comments provided by ACES Power:

We agree additional clarity is needed and recommend removing redundancies in R4. First, R4 should be clarified so that no Resource Planner (RP) can request energy and demand data from another RP. There simply is no situation in which one RP needs another RP's data. This is a FERC standards of conduct issue as it deals with competition between RPs. Second, R4 should not include the PC and BA as requesting entities since they will already be requesting data via R1. These two steps alone will eliminate the majority of the ambiguity and redundancy.

**Response:**

Information concerning available Generating Resources of the Resource Planner are not included under this standard. If a Resource Planner believes that certain information is confidential, access to that information can be restricted under Requirement R4. The requesting entity's ability to demonstrate a reliability need will determine whether they have right to request the data under Requirement R4.

With regards to your comment concerning PCs and BAs being included in Requirement R4, this is referencing "other" PCs and BAs not your PC/BA.

Likes: 0

Dislikes: 0

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

Selected Answer: Yes

**Answer Comment:**

I agree that confidential information disclosures require clarity in light of corporate customer data protection policies and the potential impact resolution of a policy compliant response has on the information request time requirements identified in the MOD. However, with requests at system level, conflicts occurrences would be an infrequent exception.

**Response:**

If there are known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.

Likes: 0

Dislikes: 0

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0

---

**Michael Lowman - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Selected Answer:** Yes

**Answer Comment:**

**Duke Energy agrees that clarification is needed.**

**Response:**

The SDT modified Requirement R4 to provide additional clarity regarding confidentiality. The SDT has also added language to the rationale for Requirement R4 to further explain the applicability of confidentiality.

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity, they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard.



**Likes:** 0

**Dislikes:** 0

---

**Jason Marshall - ACES Power Marketing - 6 - MRO,WECC,TRE,SERC,SPP,RFC**

**Selected Answer:** Yes

**Answer Comment:**

We agree additional clarity is needed and recommend removing redundancies in R4. First, R4 should be clarified so that no Resource Planner (RP) can request energy and demand data from another RP. There simply is no situation in which one RP needs another RP's data. This is a FERC standards of conduct issue as it deals with competition between RPs. Second, R4 should not include the PC and BA as requesting entities since they will already be requesting data via R1. These two steps alone will eliminate the majority of the ambiguity and redundancy.

**Response:**

Information concerning available Generating Resources of the Resource Planner are not included under this standard. If a Resource Planner believes that certain information is confidential, access to that information can be restricted under Requirement R4. The requesting entity's ability to demonstrate a reliability need will determine whether they have right to request the data under Requirement R4.

With regards to your comment concerning PCs and BAs being included in Requirement R4, this is referencing "other" PCs and BAs not your PC/BA.

Likes: 0

Dislikes: 0

---

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

Selected Answer: Yes

**Answer Comment:**

Texas RE recommends providing clarity in order to deter entities from activities that do not support reliability.

**Response:**

Requested area's regional entity, PC or BA should not be requesting any data for any other purposes than reliability. Regional Entity bylaws and delegation agreements are limited to reliability needs. The concerns with other entities requesting data is covered in Requirement R4.

Likes: 0

Dislikes: 0

---

**Chris Scanlon - Exelon - 1 -**

Selected Answer: No

**Answer Comment:**

Exelon doesn't think the requirement needs clarification.

**Response:**

Thank you for your clarifying comment.

**Likes:**

0

**Dislikes:**

0

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**Shannon Mickens - Southwest Power Pool, Inc. (RTO) - 2 - SPP****Selected Answer:**

Yes

**Answer Comment:**

We agree there should be some type of clarity added to the standard in reference to confidential information. At this point, the current language doesn't suggest the proper handling of confidential information by any of the applicable entities. We would suggest addressing the confidential piece in Requirement R2 where the applicable entities are requesting this type of data should verify potential confidential information and the entity providing this data marking the information as such 'confidential' so there is no confusion on how this data should be handled. We also suggest to the drafting team to mention in the requirement that the data being requested is pertaining to EIA-411 and this connection needs to be re-establish on what type of data is being requested.

**Response:**

We understand your concern and have modified the Background Section to address confidentiality. Concerning confidentiality treatment by a Regional Entity,

they are governed by the NERC Rules of Procedure (specifically Section 1500). If there are any other known confidentiality issues they should be dealt with prior to the gathering of data since the scope of the data being requested is defined within the approved standard. The standard is not meant to detail the handling of confidential information.

With regards to your comment concerning EIA-411, the SDT does not want to put specifics of this type into the standard.

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** No

**Answer Comment:** BPA believes to properly plan you must provide some confidential information generically.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**RoLynda Shumpert - SCANA - South Carolina Electric and Gas Co. - 1,3,5,6 - SERC**

Selected Answer: No

**Answer Comment:**  
No additional clarity is needed.

**Response:** Thank you for your clarifying comment.

**Likes:** 0

**Dislikes:** 0

---

**Sandra Shaffer - Berkshire Hathaway - PacifiCorp - 6 -**

Selected Answer: Yes

**Answer Comment:**

**Response:**

**Likes:** 0

**Dislikes:** 0



## Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### Description of Current Draft

This is the first posting of the proposed revised standard. This proposed draft standard will be posted for a 45-day comment period and 10-day initial ballot.

Completed Actions	Date
Standards Committee approved SAR for posting	April 15, 2015
SAR posted for a 30-day informal comment period	April 16, 2015

Anticipated Actions	Date
45-day formal comment period with initial ballot	August/September 2015
Final ballot	October 2015
NERC Board adoption	November 2015

### **New or Modified Terms Used in NERC Reliability Standards**

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard.

**Term:** None



**A. Introduction**

- 1. Title: Demand and Energy Data**
- 2. Number: MOD-031-2**
- 3. Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

**4. Applicability:**

**4.1. Functional Entities:**

- 4.1.1** Planning Authority and Planning Coordinator (hereafter collectively referred to as the “Planning Coordinator”)

This proposed standard combines “Planning Authority” with “Planning Coordinator” in the list of applicable functional entities. The NERC Functional Model lists “Planning Coordinator” while the registration criteria list “Planning Authority,” and they are not yet synchronized. Until that occurs, the proposed standard applies to both “Planning Authority” and “Planning Coordinator.”

- 4.1.2** Transmission Planner
- 4.1.3** Balancing Authority
- 4.1.4** Resource Planner
- 4.1.5** Load-Serving Entity
- 4.1.6** Distribution Provider

**5. Effective Date**

- 5.1.** See the MOD-031-2 Implementation Plan.

**6. Background:**

To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management

performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## **B. Requirements and Measures**

- R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- 1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data (“Applicable Entities”).
  - 1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).
  - 1.3.** A request to provide any or all of the following actual data, as necessary:
    - 1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.
    - 1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.
      - 1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.
    - 1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.
    - 1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any,

activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

- 1.4.** A request to provide any or all of the following forecast data, as necessary:
  - 1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.
  - 1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.
  - 1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.
  - 1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.
  - 1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.
- 1.5.** A request to provide any or all of the following summary explanations, as necessary:
  - 1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.
  - 1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.
  - 1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.
  - 1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.
  - 1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.
- M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.
- R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.
- R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**Rationale for R4:** This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

- R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or

otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; and
- shall not be required to provide any requested data that, if provided, would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements; and
- shall not be required to alter the format in which it maintains or uses the data.

**4.1.** If the Applicable Entity does not provide data requested under this requirement because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Long-term Planning	Medium	N/A	N/A	N/A	The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data.
R2	Long-term Planning	Medium	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5</p>

			<p>did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>OR The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>
R3	Long-term Planning	Medium	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data collected under Requirement R2 prior to 91</p>



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			did so after 75 days from the date of request but prior to 81 days from the date of the request.	did so after 80 days from the date of request but prior to 86 days from the date of the request.	did so after 85 days from the date of request but prior to 91 days from the date of the request.	days or more from the date of the request.
R4	Long-term Planning	Medium	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written request.</p>	<p>The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written request.</p>

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	May 6, 2014	Adopted by the NERC Board of Trustees.	
1	February 19, 2015	FERC order approving MOD-031-1	

## Application Guidelines

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### Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### Rationale for R1:

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

#### Rationale for R2:

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

#### Rationale for R3:

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

#### Rationale for R4:

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the provisions outlined in Requirement R4 below. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

## Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### Description of Current Draft

This is the first posting of the proposed revised standard. This proposed draft standard will be posted for a 45-day comment period and 10-day initial ballot.

Completed Actions	Date
Standards Committee approved SAR for posting	April 15, 2015
SAR posted for a 30-day informal comment period	April 16, 2015

Anticipated Actions	Date
45-day formal comment period with initial ballot	August/September 2015
Final ballot	October 2015
NERC Board adoption	November 2015

### New or Modified Terms Used in NERC Reliability Standards

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard.

**Term:** None

## A. Introduction

1. **Title:** Demand and Energy Data
2. **Number:** MOD-031-~~24~~
3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

- 4.1. **Functional Entities:**

- 4.1.1 Planning Authority and Planning Coordinator (hereafter collectively referred to as the “Planning Coordinator”)

This proposed standard combines “Planning Authority” with “Planning Coordinator” in the list of applicable functional entities. The NERC Functional Model lists “Planning Coordinator” while the registration criteria list “Planning Authority,” and they are not yet synchronized. Until that occurs, the proposed standard applies to both “Planning Authority” and “Planning Coordinator.”

- 4.1.2 Transmission Planner

- 4.1.3 Balancing Authority

- 4.1.4 Resource Planner

- 4.1.5 Load-Serving Entity

- 4.1.6 Distribution Provider

5. **Effective Date**

- 5.1. ~~See the MOD-031-2 Implementation Plan. MOD-031-1 shall become effective on the first day of the first calendar quarter that is twelve months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the first day of the first calendar quarter that is twelve months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.~~

6. **Background:**

To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning

Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## B. Requirements and Measures

- R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- 1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data (“Applicable Entities”).
  - 1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).
  - 1.3.** A request to provide any or all of the following actual data, as necessary:
    - 1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.
    - 1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.
      - 1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.

- 1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.
- 1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any, activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).
- 1.4.** A request to provide any or all of the following forecast data, as necessary:
  - 1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.
  - 1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.
  - 1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.
  - 1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.
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- 1.5.** A request to provide any or all of the following summary explanations, as necessary,:
  - 1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.
  - 1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.
  - 1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.
  - 1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.
  - 1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations



(e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.

- M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.
- R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.
- R3.** The Planning Coordinator or the Balancing Authority shall provide the data ~~listed~~~~collected~~ under Requirement R1 Parts 1.3 through 1.5 for their area~~R2~~ to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**Rationale for R4:** This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity’s confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity’s existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

- R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; and
  - shall not be required to provide any requested data that, if provided, would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements; and
  - shall not be required to alter the format in which it maintains or uses the data.
- 4.1.** If the Applicable Entity does not provide data requested under this requirement because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.
- M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

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The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

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#### 1.4. Additional Compliance Information

None

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R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Long-term Planning	Medium	N/A	N/A	N/A	The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data.
R2	Long-term Planning	Medium	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5</p>

			<p>did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>OR The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>
R3	Long-term Planning	Medium	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data collected under Requirement R2, but</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data collected under Requirement R2 prior to 91</p>

			did so after 75 days from the date of request but prior to 81 days from the date of the request.	did so after 80 days from the date of request but prior to 86 days from the date of the request.	did so after 85 days from the date of request but prior to 91 days from the date of the request.	days or more from the date of the request.
R4	Long-term Planning	Medium	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written request.</p>	<p>The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written request.</p>

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Version History**

Version	Date	Action	Change Tracking
1	May 6, 2014	Adopted by the NERC Board of Trustees.	
1	February 19, 2015	FERC order approving MOD-031-1	

## Application Guidelines

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### Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### Rationale for R1:

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

#### Rationale for R2:

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

#### Rationale for R3:

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

#### Rationale for R4:

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the provisions outlined in Requirement R4 below. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.



## Implementation Plan

### Project 2010-04.1 Demand and Energy Data

#### Implementation Plan for MOD-031-2 – Demand and Energy Data

##### ***Approvals Required***

MOD-031-2 – Demand and Energy Data

##### ***Prerequisite Approvals***

There are no other standards that must receive approval prior to the approval of this standard.

##### ***Revisions to Glossary Terms***

N/A

##### ***Applicable Entities***

Planning Coordinator and Planning Authority

Transmission Planner

Resource Planner

Balancing Authority

Load-Serving Entity

Distribution Provider

##### ***Applicable Facilities***

N/A

##### ***Conforming Changes to Other Standards***

None

##### ***Effective Dates***

MOD-031-2 shall become effective as follows:

The later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is

required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

***Justification***

The six-month implementation period will provide sufficient time for the applicable entities to develop the necessary process to implement this standard.

***Retirements***

MOD-031-1 shall be retired at 11:59:59 p.m. of the day immediately prior to the effective date of MOD-031-2 in the particular jurisdiction in which the new standard is becoming effective.

## Unofficial Comment Form

### Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

**DO NOT** use this form for submitting comments. Use the [electronic form](#) to submit comments on the proposed standard **MOD-031-2 – Demand and Energy Data** to address FERC Order No. 804 directives. Comments must be submitted by **8 p.m. Eastern, Friday, September 18, 2015**.

Documents and information about this project are available on the [project page](#). If you have questions, contact Senior Standards Developer, [Darrel Richardson](#) (via email), or at (609) 613-1848.

#### Background Information

The collection of demand projections requires coordination and collaboration between Planning Authorities (also referred to as “Planning Coordinators”), Transmission and Resource Planners, and Load-Serving Entities. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – will enhance the reliability of the BPS. Collection of actual demand and demand-side management performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices. This project will modify the language in Requirement R3 to clarify certain obligations to provide data to the Regional Entity and will also address the directive to consider the compliance obligations of an applicable entity upon receipt of a data request that seeks confidential information.

#### Questions

1. The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.

Yes:

No:

Comments:

## Standards Announcement **Reminder**

Project 2010-04.1 MOD-031 FERC Order No. 804 Directives  
MOD-031-2

**Initial Ballot and Non-binding Poll Open through September 18, 2015**

### [Now Available](#)

An initial ballot for draft one of **MOD-031-2 – Demand and Energy Data** and a non-binding poll of the associated Violation Risk Factors (VRFs) and Violation Severity Levels (VSLs) are open through **8 p.m. Eastern, Friday, September 18, 2015.**

### **Balloting**

Members of the ballot pools associated with this project may log in and submit their votes for the standard and associated VRFs and VSLs by clicking [here](#).

*If you are having difficulty accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out, contact NERC IT support directly at [EROhelpdesk@nerc.net](mailto:EROhelpdesk@nerc.net) (Monday – Friday, 8 a.m. - 8 p.m. Eastern).*

### **Next Steps**

The ballot results will be announced and posted on the project page. The drafting team will consider all comments received during the formal comment period and, if needed, make revisions to the standard and post it for an additional ballot. If the comments do not show the need for significant revisions, the standard will proceed to a final ballot.

### **Standards Development Process**

For more information on the Standards Development Process, please refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Darrel Richardson](#) (via email) or at (609) 613-1848.

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3353 Peachtree Rd, NE  
Suite 600, North Tower  
Atlanta, GA 30326  
404-446-2560 | [www.nerc.com](http://www.nerc.com)

## Standards Announcement

### Project 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2

**Formal Comment Period Open through September 18, 2015**  
**Ballot Pools Forming through August 31, 2015**

#### [Now Available](#)

A 45-day formal comment period for draft one of **MOD-031-2 – Demand and Energy Data** is open through **8 p.m. Eastern, Friday, September 18, 2015.**

#### **Commenting**

Use the [electronic form](#) to submit comments on the standard. If you experience any difficulties in using the electronic form, contact [Wendy Muller](#). An unofficial Word version of the comment form is posted on the [project page](#).

#### **Join the Ballot Pools**

Ballot pools are being formed through **8 p.m. Eastern, Monday, August 31, 2015.** Registered Ballot Body members may join the ballot pools [here](#).

#### **Next Steps**

An initial ballot for the standard and a non-binding poll of the associated Violation Risk Factors and Violation Severity Levels will be conducted **September 9-18, 2015.**

#### **Standards Development Process**

For more information on the Standards Development Process, please refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Darrel Richardson](#) (via email) or at (609) 613-1848.

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## Standards Announcement

Project 2010-04.1 MOD-031 FERC Order No. 804 Directives  
MOD-031-2

**RSAW Posted for Industry Comment through Friday, September 18, 2015**

### Now Available

The draft RSAW for **MOD-031-2 – Demand and Energy Data** is posted on the [project page](#) for industry comment through **8 p.m. Eastern, Friday, September 18, 2015**. Submit feedback regarding the draft RSAW to [RSAWfeedback@nerc.net](mailto:RSAWfeedback@nerc.net).

For more information or assistance, contact Senior Standards Developer, [Darrel Richardson](#) (via email) or at (609) 613-1848.

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## Standards Announcement

Project 2010-04.1 MOD-031 FERC Order No. 804 Directives  
MOD-031-2

### Initial Ballot and Non-binding Poll Results

#### [Now Available](#)

A formal comment period and initial ballot for draft one of **MOD-031-2 – Demand and Energy Data** as well as a non-binding poll of the associated Violation Risk Factors and Violation Severity Levels concluded **8 p.m. Eastern, Friday, September 18, 2015.**

The initial ballot received sufficient affirmative votes for approval. Voting statistics are listed below, and the [Ballot Results](#) page provides detailed results for the ballot and non-binding poll.

Ballot	Non-binding Poll
Quorum /Approval	Quorum/Supportive Opinions
85.57% / 87.36%	82.90% / 89.20%

#### Next Steps

The drafting team will consider all comments received during the formal comment period and determine the next steps for the project.

#### Standards Development Process

For more information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Darrel Richardson](#) (via email) or at (609) 613-1848.

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# NERC Balloting Tool (/)

[Dashboard \(/\)](#)
[Users](#)
[Ballots](#)
[Surveys](#)
[Legacy SBS \(https://standards.nerc.net/\)](https://standards.nerc.net/)
[Login \(/Users/Login/\)](/Users/Login/) / [Register \(/Users/Register/\)](/Users/Register/)

## BALLOT RESULTS

Survey: [View Survey Results \(/SurveyResults/Index/28\)](/SurveyResults/Index/28)

**Ballot Name:** 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 IN 1 ST

**Voting Start Date:** 9/9/2015 12:01:00 AM

**Voting End Date:** 9/18/2015 8:00:00 PM

**Ballot Type:** ST

**Ballot Activity:** IN

**Ballot Series:** 1

**Total # Votes:** 255

**Total Ballot Pool:** 298

**Quorum:** 85.57

**Weighted Segment Value:** 87.36

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	76	1	53	0.914	5	0.086	0	9	9
Segment: 2	9	0.6	5	0.5	1	0.1	0	1	2
Segment: 3	68	1	47	0.87	7	0.13	0	4	10
Segment: 4	26	1	15	0.714	6	0.286	0	1	4
Segment: 5	67	1	45	0.938	3	0.062	0	4	15
Segment: 6	41	1	33	0.917	3	0.083	0	2	3
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	1	0.1	1	0.1	0	0	0	0	0
Segment: 2	2	0.2	1	0.1	1	0.1	0	0	0



9									
Segment: 10	8	0.8	8	0.8	0	0	0	0	0
Totals:	298	6.7	208	5.853	26	0.847	0	21	43

## BALLOT POOL MEMBERS

Show  entries

Search:

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Ameren - Ameren Services	Eric Scott		None	N/A
1	American Transmission Company, LLC	Andrew Pusztai		Abstain	N/A
1	APS - Arizona Public Service Co.	Michelle Amarantos		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Phil Hart		Affirmative	N/A
1	Avista - Avista Corporation	Bryan Cox	Rich Hydzik	Affirmative	N/A
1	Balancing Authority of Northern California	Kevin Smith	Joe Tarantino	Affirmative	N/A
1	BC Hydro and Power Authority	Patricia Robertson		Abstain	N/A
1	Beaches Energy Services	Don Cuevas		Negative	Third-Party Comments
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Affirmative	N/A

1	Black Hills Corporation	Wes Wingen		Abstain	N/A
1	Bonneville Power Administration	Donald Watkins		Affirmative	N/A
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey		None	N/A
1	Bryan Texas Utilities	John Fontenot		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	John Brockhan		Affirmative	N/A
1	Central Electric Power Cooperative (Missouri)	Michael Bax		None	N/A
1	Cleco Corporation	John Lindsey	Louis Guidry	Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Chris de Graffenried		Affirmative	N/A
1	Dairyland Power Cooperative	Robert Roddy		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Larry Nash		Negative	Comments Submitted
1	Duke Energy	Doug Hils		Affirmative	N/A
1	Edison International - Southern California Edison Company	Steven Mavis		Affirmative	N/A
1	Entergy - Entergy Services, Inc.	Oliver Burke		Affirmative	N/A
1	Exelon	Chris Scanlon		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	William Smith		Affirmative	N/A
1	Georgia Transmission Corporation	Jason Snodgrass		Affirmative	N/A
1	Great Plains Energy - Kansas City Power and Light Co.	James McBee	Douglas Webb	Affirmative	N/A

1	Great River Energy	Gordon Pietsch		Affirmative	N/A
1	Hoosier Energy Rural Electric Cooperative, Inc.	Bob Solomon		None	N/A
1	Hydro One Networks, Inc.	Payam Farahbakhsh		Abstain	N/A
1	Hydro-Québec TransEnergie	Martin Boisvert		Affirmative	N/A
1	IDACORP - Idaho Power Company	Molly Devine		Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Meghan Ferguson	Abstain	N/A
1	KAMO Electric Cooperative	Walter Kenyon		Affirmative	N/A
1	Los Angeles Department of Water and Power	faranak sarbaz		Affirmative	N/A
1	Lower Colorado River Authority	Teresa Cantwell		Abstain	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Manitoba Hydro	Mike Smith		Affirmative	N/A
1	MEAG Power	David Weekley	Scott Miller	None	N/A
1	Muscatine Power and Water	Andy Kurriger		Affirmative	N/A
1	National Grid USA	Michael Jones		Affirmative	N/A
1	NB Power Corporation	Alan MacNaughton		Affirmative	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
1	New York Power Authority	Salvatore Spagnolo		None	N/A
1	NextEra Energy - Florida Power and Light Co.	Mike O'Neil		Affirmative	N/A

1	NiSource - Northern Indiana Public Service Co.	Julaine Dyke		Affirmative	N/A
1	Northeast Missouri Electric Power Cooperative	Kevin White		Affirmative	N/A
1	NorthWestern Energy	Belinda Tierney		None	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Negative	Third-Party Comments
1	Oncor Electric Delivery	Rod Kinard	Gul Khan	Affirmative	N/A
1	OTP - Otter Tail Power Company	Charles Wicklund		Affirmative	N/A
1	Peak Reliability	Jared Shakespeare		Abstain	N/A
1	PHI - Potomac Electric Power Co.	David Thorne		Affirmative	N/A
1	Platte River Power Authority	John Collins		Affirmative	N/A
1	PNM Resources - Public Service Company of New Mexico	Laurie Williams		None	N/A
1	PPL Electric Utilities Corporation	Brenda Truhe		Abstain	N/A
1	PSEG - Public Service Electric and Gas Co.	Joseph Smith		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Long Duong		Affirmative	N/A
1	Public Utility District No. 2 of Grant County, Washington	Michiko Sell		Negative	Comments Submitted
1	Sacramento Municipal Utility District	Tim Kelley	Joe Tarantino	Affirmative	N/A
1	Salt River Project	Steven Cobb		Affirmative	N/A

1	Santee Cooper	Shawn Abrams		Affirmative	N/A
1	SCANA - South Carolina Electric and Gas Co.	Tom Hanzlik		Abstain	N/A
1	Seattle City Light	Pawel Krupa		Affirmative	N/A
1	Seminole Electric Cooperative, Inc.	Mark Churilla	Bret Galbraith	Affirmative	N/A
1	Sho-Me Power Electric Cooperative	Denise Stevens		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Robert A. Schaffeld		Affirmative	N/A
1	Southwest Transmission Cooperative, Inc.	John Shaver		Negative	Third-Party Comments
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell		Affirmative	N/A
1	Tallahassee Electric (City of Tallahassee, FL)	Scott Langston		Affirmative	N/A
1	Tennessee Valley Authority	Howell Scott		Affirmative	N/A
1	Tri-State G and T Association, Inc.	Tracy Sliman		Affirmative	N/A
1	Unisource - Tucson Electric Power Co.	John Tolo		Affirmative	N/A
1	United Illuminating Co.	Jonathan Appelbaum		Affirmative	N/A
1	Westar Energy	Kevin Giles		Affirmative	N/A
1	Western Area Power Administration	Steve Johnson		None	N/A
1	Xcel Energy, Inc.	Dean Schiro		Affirmative	N/A
2	BC Hydro and Power Authority	Venkataramakrishnan Vinnakota		Abstain	N/A
2	California ISO	Richard Vine		Affirmative	N/A

2	Electric Reliability Council of Texas, Inc.	christina bigelow		Negative	Comments Submitted
2	Herb Schrayshuen	Herb Schrayshuen		Affirmative	N/A
2	Independent Electricity System Operator	Leonard Kula		Affirmative	N/A
2	ISO New England, Inc.	Michael Puscas	John Pearson	Affirmative	N/A
2	Midcontinent ISO, Inc.	Terry Blilke		None	N/A
2	New York Independent System Operator	Gregory Campoli		None	N/A
2	PJM Interconnection, L.L.C.	Mark Holman		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras		None	N/A
3	Anaheim Public Utilities Dept.	Dennis Schmidt		Affirmative	N/A
3	APS - Arizona Public Service Co.	Jeri Freimuth		Affirmative	N/A
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
3	Austin Energy	Lisa Martin		Affirmative	N/A
3	Avista - Avista Corporation	Scott Kinney		Abstain	N/A
3	Basin Electric Power Cooperative	Jeremy Voll		Affirmative	N/A
3	BC Hydro and Power Authority	Pat Harrington		None	N/A
3	Beaches Energy Services	Steven Lancaster		Negative	Third-Party Comments
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Thomas Mielnik	Darnez Gresham	Affirmative	N/A

3	Bonneville Power Administration	Rebecca Berdahl		Affirmative	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
3	City of Green Cove Springs	Mark Schultz		Negative	Third-Party Comments
3	City of Leesburg	Chris Adkins		Negative	Third-Party Comments
3	Clark Public Utilities	Jack Stamper		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs Utilities	Charles Morgan		Affirmative	N/A
3	Con Ed - Consolidated Edison Co. of New York	Peter Yost		Affirmative	N/A
3	Dominion - Dominion Resources, Inc.	Connie Lowe		Negative	Comments Submitted
3	DTE Energy - Detroit Edison Company	Kent Kujala		Affirmative	N/A
3	Duke Energy	Lee Schuster		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Exelon	John Bee		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
3	Florida Municipal Power Agency	Joe McKinney		Negative	Third-Party Comments
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Grand River Dam Authority	Jeff Wells		Abstain	N/A

3	Great Plains Energy - Kansas City Power and Light Co.	Jessica Tucker	Douglas Webb	Affirmative	N/A
3	Great River Energy	Brian Glover		Affirmative	N/A
3	Hydro One Networks, Inc.	Paul Malozewski	Oshani Pathirane	Abstain	N/A
3	JEA	Garry Baker		None	N/A
3	KAMO Electric Cooperative	Ted Hilmes		Affirmative	N/A
3	Lakeland Electric	Mace Hunter		Negative	Third-Party Comments
3	Lincoln Electric System	Jason Fortik		Affirmative	N/A
3	Los Angeles Department of Water and Power	Mike Anctil		Affirmative	N/A
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A
3	Manitoba Hydro	Karim Abdel-Hadi		Affirmative	N/A
3	MEAG Power	Roger Brand	Scott Miller	None	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
3	New York Power Authority	David Rivera		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Ramon Barany		None	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Negative	Third-Party Comments
3	PHI - Potomac	Mark Yerger		Affirmative	N/A



	Electric Power Co.				
3	PNM Resources	Michael Mertz		None	N/A
3	PPL - Louisville Gas and Electric Co.	Charles Freibert		Abstain	N/A
3	PSEG - Public Service Electric and Gas Co.	Jeffrey Mueller		Affirmative	N/A
3	Public Utility District No. 1 of Okanogan County	Dale Dunckel		None	N/A
3	Puget Sound Energy, Inc.	Andrea Basinski		None	N/A
3	Sacramento Municipal Utility District	Rachel Moore	Joe Tarantino	Affirmative	N/A
3	Salt River Project	John Coggins		Affirmative	N/A
3	Santee Cooper	James Poston		Affirmative	N/A
3	SCANA - South Carolina Electric and Gas Co.	Clay Young		None	N/A
3	Seattle City Light	Dana Wheelock		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	James Frauen		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jeff Neas		Affirmative	N/A
3	Snohomish County PUD No. 1	Mark Oens		Affirmative	N/A
3	Southern Company - Alabama Power Company	R. Scott Moore		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	Marc Donaldson		Affirmative	N/A
3	Tallahassee Electric (City of Tallahassee, FL)	John Williams		Affirmative	N/A
3	TECO - Tampa	Ronald Donahey		None	N/A

	Electric Co.				
3	Tennessee Valley Authority	Ian Grant		Affirmative	N/A
3	Tri-State G and T Association, Inc.	Janelle Marriott Gill		Affirmative	N/A
3	WEC Energy Group, Inc.	James Keller		Affirmative	N/A
3	Westar Energy	Bo Jones		Affirmative	N/A
3	Xcel Energy, Inc.	Michael Ibold		Affirmative	N/A
4	Alliant Energy Corporation Services, Inc.	Kenneth Goldsmith		Affirmative	N/A
4	Austin Energy	Tina Garvey		Affirmative	N/A
4	Blue Ridge Power Agency	Duane Dahlquist		None	N/A
4	City of Clewiston	Lynne Mila		Negative	Third-Party Comments
4	City of New Smyrna Beach Utilities Commission	Tim Beyrle		Negative	Third-Party Comments
4	City of Redding	Nick Zettel	Bill Hughes	Affirmative	N/A
4	CMS Energy - Consumers Energy Company	Julie Hegedus		None	N/A
4	DTE Energy - Detroit Edison Company	Daniel Herring		Affirmative	N/A
4	FirstEnergy - Ohio Edison Company	Doug Hohlbaugh		Affirmative	N/A
4	Florida Municipal Power Agency	Carol Chinn		Negative	Third-Party Comments
4	Georgia System Operations Corporation	Guy Andrews		Affirmative	N/A
4	Illinois Municipal Electric Agency	Bob Thomas		Negative	Comments Submitted
4	Keys Energy	Stanley Rzad		Negative	Third-Party

	Services				Comments
4	MGE Energy - Madison Gas and Electric Co.	Joseph DePoorter		Affirmative	N/A
4	Modesto Irrigation District	Spencer Tacke		None	N/A
4	Municipal Energy Agency of Nebraska	Robin Spady		Abstain	N/A
4	Oklahoma Municipal Power Authority	Ashley Stringer		Affirmative	N/A
4	Public Utility District No. 1 of Snohomish County	John Martinsen		Affirmative	N/A
4	Public Utility District No. 2 of Grant County, Washington	Yvonne McMackin		Negative	Comments Submitted
4	Sacramento Municipal Utility District	Michael Ramirez	Joe Tarantino	Affirmative	N/A
4	Seattle City Light	Hao Li		Affirmative	N/A
4	Seminole Electric Cooperative, Inc.	Michael Ward		Affirmative	N/A
4	South Mississippi Electric Power Association	Steve McElhaney		None	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho		Affirmative	N/A
4	Utility Services, Inc.	Brian Evans-Mongeon		Affirmative	N/A
4	WEC Energy Group, Inc.	Anthony Jankowski		Affirmative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		None	N/A
5	APS - Arizona Public Service Co.	Stephanie Little		Affirmative	N/A
5	Austin Energy	Jeanie Doty		Affirmative	N/A

5	Avista - Avista Corporation	Steve Wenke		None	N/A
5	Basin Electric Power Cooperative	Mike Kraft		None	N/A
5	BC Hydro and Power Authority	Clement Ma		None	N/A
5	Boise-Kuna Irrigation District - Lucky Peak Power Plant Project	Mike Kukla		Affirmative	N/A
5	Bonneville Power Administration	Francis Halpin		Affirmative	N/A
5	Brazos Electric Power Cooperative, Inc.	Shari Heino		Affirmative	N/A
5	Calpine Corporation	Hamid Zakery		Affirmative	N/A
5	Choctaw Generation Limited Partnership, LLLP	Rob Watson		Affirmative	N/A
5	City and County of San Francisco	Daniel Mason		Affirmative	N/A
5	City of Independence, Power and Light Department	Jim Nail		Affirmative	N/A
5	City of Redding	Paul Cummings	Bill Hughes	Affirmative	N/A
5	Cleco Corporation	Stephanie Huffman	Louis Guidry	Affirmative	N/A
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Affirmative	N/A
5	Con Ed - Consolidated Edison Co. of New York	Brian O'Boyle		Affirmative	N/A
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Randi Heise		Negative	Comments Submitted
5	DTE Energy - Detroit Edison Company	Jeffrey DePriest		Affirmative	N/A

5	Duke Energy	Dale Goodwine		Affirmative	N/A
5	Edison International - Southern California Edison Company	Michael McSpadden		Affirmative	N/A
5	Entergy - Entergy Services, Inc.	Tracey Stubbs		None	N/A
5	Exelon	Vince Catania		Affirmative	N/A
5	FirstEnergy - FirstEnergy Solutions	Robert Loy		None	N/A
5	Florida Municipal Power Agency	David Schumann		Negative	Third-Party Comments
5	Great Plains Energy - Kansas City Power and Light Co.	Harold Wyble	Douglas Webb	Affirmative	N/A
5	Great River Energy	Preston Walsh		Affirmative	N/A
5	Hydro-Quebec Production	Roger Dufresne		Abstain	N/A
5	JEA	John Babik		Affirmative	N/A
5	Lakeland Electric	Jim Howard		None	N/A
5	Lincoln Electric System	Kayleigh Wilkerson		Affirmative	N/A
5	Los Angeles Department of Water and Power	Kenneth Silver		None	N/A
5	Lower Colorado River Authority	Dixie Wells		Abstain	N/A
5	Luminant - Luminant Generation Company LLC	Rick Terrill		None	N/A
5	Manitoba Hydro	Yuguang Xiao		Affirmative	N/A
5	Massachusetts Municipal Wholesale Electric Company	David Gordon		Abstain	N/A
5	MEAG Power	Steven Grego	Scott Miller	None	N/A
5	Muscatine Power and Water	Mike Avesing		Affirmative	N/A

5	NB Power Corporation	Rob Vance		Affirmative	N/A
5	Nebraska Public Power District	Don Schmit		Affirmative	N/A
5	New York Power Authority	Wayne Sipperly		Affirmative	N/A
5	NextEra Energy	Allen Schriver		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Michael Melvin		Affirmative	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Leo Staples		Negative	Third-Party Comments
5	Oglethorpe Power Corporation	Bernard Johnson		None	N/A
5	Omaha Public Power District	Mahmood Safi		Affirmative	N/A
5	OTP - Otter Tail Power Company	Cathy Fogale		Affirmative	N/A
5	Pacific Gas and Electric Company	Alex Chua		None	N/A
5	Platte River Power Authority	Tyson Archie		Affirmative	N/A
5	PPL Electric Utilities Corporation	Dan Wilson		Abstain	N/A
5	PSEG - PSEG Fossil LLC	Tim Kucey		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Sam Nietfeld		Affirmative	N/A
5	Public Utility District No. 2 of Grant County, Washington	Alex Ybarra		Affirmative	N/A
5	Puget Sound Energy, Inc.	Lynda Kupfer		None	N/A
5	Sacramento Municipal Utility District	Susan Gill-Zobitz	Joe Tarantino	Affirmative	N/A

5	Salt River Project	Kevin Nielsen		Affirmative	N/A
5	SCANA - South Carolina Electric and Gas Co.	Edward Magic		None	N/A
5	Seattle City Light	Mike Haynes		Affirmative	N/A
5	Southern Company - Southern Company Generation	William D. Shultz		Affirmative	N/A
5	Tacoma Public Utilities (Tacoma, WA)	Chris Mattson		None	N/A
5	Tallahassee Electric (City of Tallahassee, FL)	Karen Webb		Affirmative	N/A
5	Tennessee Valley Authority	Brandy Spraker		Affirmative	N/A
5	WEC Energy Group, Inc.	Linda Horn		Affirmative	N/A
5	Westar Energy	stephanie johnson		Affirmative	N/A
5	Xcel Energy, Inc.	Mark Castagneri		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		None	N/A
6	APS - Arizona Public Service Co.	Bobbi Welch		Affirmative	N/A
6	Associated Electric Cooperative, Inc.	Brian Ackermann		Affirmative	N/A
6	Austin Energy	Andrew Gallo		Affirmative	N/A
6	Berkshire Hathaway - PacifiCorp	Sandra Shaffer		Affirmative	N/A
6	Bonneville Power Administration	Alex Spain		Affirmative	N/A
6	City of Redding	Marvin Briggs	Bill Hughes	Affirmative	N/A
6	Cleco Corporation	Robert Hirschak	Louis Guidry	Affirmative	N/A
6	Colorado Springs Utilities	Shannon Fair		Affirmative	N/A

6	Con Ed - Consolidated Edison Co. of New York	Robert Winston		Affirmative	N/A
6	Dominion - Dominion Resources, Inc.	Louis Slade		Negative	Comments Submitted
6	Duke Energy	Greg Cecil		Affirmative	N/A
6	Exelon	Dave Carlson		Affirmative	N/A
6	FirstEnergy - FirstEnergy Solutions	Ann Ivanc	Richard Hoag	Affirmative	N/A
6	Florida Municipal Power Agency	Richard Montgomery		Negative	Third-Party Comments
6	Florida Municipal Power Pool	Tom Reedy		Negative	Comments Submitted
6	Great Plains Energy - Kansas City Power and Light Co.	Chris Bridges	Douglas Webb	Affirmative	N/A
6	Great River Energy	Donna Stephenson	Michael Brytowski	Affirmative	N/A
6	Lower Colorado River Authority	Michael Shaw		Abstain	N/A
6	Manitoba Hydro	Blair Mukanik		Affirmative	N/A
6	Muscatine Power and Water	Ryan Streck		Affirmative	N/A
6	New York Power Authority	Shivaz Chopra		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Affirmative	N/A
6	NiSource - Northern Indiana Public Service Co.	Joe O'Brien		Affirmative	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Jerry Nottnagel		None	N/A
6	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
6	Platte River Power	Carol Ballantine		Affirmative	N/A



	Authority				
6	PPL - Louisville Gas and Electric Co.	OELKER LINN		Abstain	N/A
6	Sacramento Municipal Utility District	Diane Clark	Joe Tarantino	Affirmative	N/A
6	Salt River Project	William Abraham	Chris Janick	Affirmative	N/A
6	Santee Cooper	Michael Brown		Affirmative	N/A
6	Seattle City Light	Charles Freeman		Affirmative	N/A
6	Seminole Electric Cooperative, Inc.	Trudy Novak		Affirmative	N/A
6	Snohomish County PUD No. 1	Kenn Backholm		Affirmative	N/A
6	Southern Company - Southern Company Generation and Energy Marketing	John J. Ciza		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Rick Applegate		Affirmative	N/A
6	Talen Energy Marketing, LLC	Elizabeth Davis		Affirmative	N/A
6	Tennessee Valley Authority	Marjorie Parsons		Affirmative	N/A
6	WEC Energy Group, Inc.	David Hathaway		None	N/A
6	Westar Energy	Tiffany Lake		Affirmative	N/A
6	Xcel Energy, Inc.	Peter Colussy		Affirmative	N/A
8	David Kiguel	David Kiguel		Affirmative	N/A
9	City of Vero Beach	Ginny Beigel		Negative	Third-Party Comments
9	Commonwealth of Massachusetts Department of Public Utilities	Donald Nelson		Affirmative	N/A
10	Florida Reliability	Peter Heidrich		Affirmative	N/A

	Coordinating Council				
10	Midwest Reliability Organization	Russel Mountjoy		Affirmative	N/A
10	Northeast Power Coordinating Council	Guy V. Zito		Affirmative	N/A
10	ReliabilityFirst	Anthony Jablonski		Affirmative	N/A
10	SERC Reliability Corporation	Joe Spencer		Affirmative	N/A
10	Southwest Power Pool Regional Entity	Bob Reynolds		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A

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# NERC Balloting Tool (/)

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## BALLOT RESULTS

Survey: [View Survey Results \(/SurveyResults/Index/28\)](#)

**Ballot Name:** 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 Non-binding Poll IN 1 NB

**Voting Start Date:** 9/9/2015 12:01:00 AM

**Voting End Date:** 9/18/2015 8:00:00 PM

**Ballot Type:** NB

**Ballot Activity:** IN

**Ballot Series:** 1

**Total # Votes:** 223

**Total Ballot Pool:** 269

**Quorum:** 82.9

**Weighted Segment Value:** 89.2

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	69	1	42	0.933	3	0.067	0	14	10
Segment: 2	8	0.5	4	0.4	1	0.1	0	1	2
Segment: 3	65	1	37	0.881	5	0.119	0	12	11
Segment: 4	21	1	11	0.688	5	0.312	0	3	2
Segment: 5	60	1	31	0.939	2	0.061	0	10	17
Segment: 6	36	1	25	0.926	2	0.074	0	5	4
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	1	0.1	1	0.1	0	0	0	0	0
Segment: 2	2	0.2	1	0.1	1	0.1	0	0	0

9									
Segment: 10	7	0.5	5	0.5	0	0	0	2	0
Totals:	269	6.3	157	5.467	19	0.833	0	47	46

## BALLOT POOL MEMBERS

Show  entries

Search:

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Ameren - Ameren Services	Eric Scott		None	N/A
1	APS - Arizona Public Service Co.	Michelle Amarantos		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Phil Hart		Affirmative	N/A
1	Avista - Avista Corporation	Bryan Cox	Rich Hydzik	Affirmative	N/A
1	Balancing Authority of Northern California	Kevin Smith	Joe Tarantino	Affirmative	N/A
1	BC Hydro and Power Authority	Patricia Robertson		Abstain	N/A
1	Beaches Energy Services	Don Cuevas		Negative	Comments Submitted
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Affirmative	N/A
1	Bonneville Power Administration	Donald Watkins		Affirmative	N/A
1	Brazos Electric	Tony Kroskey		None	N/A

	Power Cooperative, Inc.				
1	Bryan Texas Utilities	John Fontenot		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	John Brockhan		Abstain	N/A
1	Central Electric Power Cooperative (Missouri)	Michael Bax		None	N/A
1	Cleco Corporation	John Lindsey	Louis Guidry	Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Chris de Graffenried		Affirmative	N/A
1	Dairyland Power Cooperative	Robert Roddy		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Larry Nash		Abstain	N/A
1	Duke Energy	Doug Hils		Affirmative	N/A
1	Edison International - Southern California Edison Company	Steven Mavis		Affirmative	N/A
1	Entergy - Entergy Services, Inc.	Oliver Burke		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	William Smith		Affirmative	N/A
1	Georgia Transmission Corporation	Jason Snodgrass		Affirmative	N/A
1	Great Plains Energy - Kansas City Power and Light Co.	James McBee	Douglas Webb	Affirmative	N/A
1	Great River Energy	Gordon Pietsch		Affirmative	N/A
1	Hoosier Energy Rural Electric Cooperative, Inc.	Bob Solomon		None	N/A
1	Hydro One Networks, Inc.	Payam Farahbakhsh		Abstain	N/A

1	Hydro-Québec TransEnergie	Martin Boisvert		Affirmative	N/A
1	IDACORP - Idaho Power Company	Molly Devine		Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Meghan Ferguson	Abstain	N/A
1	KAMO Electric Cooperative	Walter Kenyon		Affirmative	N/A
1	Los Angeles Department of Water and Power	faranak sarbaz		Abstain	N/A
1	Lower Colorado River Authority	Teresa Cantwell		Abstain	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Manitoba Hydro	Mike Smith		Affirmative	N/A
1	MEAG Power	David Weekley	Scott Miller	None	N/A
1	Muscatine Power and Water	Andy Kurriger		Affirmative	N/A
1	National Grid USA	Michael Jones		Affirmative	N/A
1	Nebraska Public Power District	Jamison Cawley		Abstain	N/A
1	New York Power Authority	Salvatore Spagnolo		None	N/A
1	NextEra Energy - Florida Power and Light Co.	Mike O'Neil		Affirmative	N/A
1	NiSource - Northern Indiana Public Service Co.	Julaine Dyke		Affirmative	N/A
1	Northeast Missouri Electric Power Cooperative	Kevin White		Affirmative	N/A
1	NorthWestern Energy	Belinda Tierney		None	N/A

1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		None	N/A
1	Oncor Electric Delivery	Rod Kinard	Gul Khan	Affirmative	N/A
1	Peak Reliability	Jared Shakespeare		Abstain	N/A
1	Platte River Power Authority	John Collins		Abstain	N/A
1	PNM Resources - Public Service Company of New Mexico	Laurie Williams		None	N/A
1	PPL Electric Utilities Corporation	Brenda Truhe		Abstain	N/A
1	PSEG - Public Service Electric and Gas Co.	Joseph Smith		Abstain	N/A
1	Public Utility District No. 1 of Snohomish County	Long Duong		Affirmative	N/A
1	Public Utility District No. 2 of Grant County, Washington	Michiko Sell		Negative	Comments Submitted
1	Sacramento Municipal Utility District	Tim Kelley	Joe Tarantino	Affirmative	N/A
1	Salt River Project	Steven Cobb		Affirmative	N/A
1	Santee Cooper	Shawn Abrams		Affirmative	N/A
1	SCANA - South Carolina Electric and Gas Co.	Tom Hanzlik		Abstain	N/A
1	Seattle City Light	Pawel Krupa		Affirmative	N/A
1	Seminole Electric Cooperative, Inc.	Mark Churilla	Bret Galbraith	Affirmative	N/A
1	Sho-Me Power Electric Cooperative	Denise Stevens		Affirmative	N/A
1	Southern Company -	Robert A. Schaffeld		Affirmative	N/A

	Southern Company Services, Inc.				
1	Southwest Transmission Cooperative, Inc.	John Shaver		Negative	Comments Submitted
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell		Affirmative	N/A
1	Tallahassee Electric (City of Tallahassee, FL)	Scott Langston		Affirmative	N/A
1	Tennessee Valley Authority	Howell Scott		Abstain	N/A
1	Tri-State G and T Association, Inc.	Tracy Sliman		Affirmative	N/A
1	Unisource - Tucson Electric Power Co.	John Tolo		Affirmative	N/A
1	United Illuminating Co.	Jonathan Appelbaum		Affirmative	N/A
1	Westar Energy	Kevin Giles		Affirmative	N/A
1	Western Area Power Administration	Steve Johnson		None	N/A
2	BC Hydro and Power Authority	Venkataramakrishnan Vinnakota		Abstain	N/A
2	California ISO	Richard Vine		Affirmative	N/A
2	Electric Reliability Council of Texas, Inc.	christina bigelow		Negative	Comments Submitted
2	Herb Schrayshuen	Herb Schrayshuen		Affirmative	N/A
2	Independent Electricity System Operator	Leonard Kula		Affirmative	N/A
2	Midcontinent ISO, Inc.	Terry Blilke		None	N/A
2	New York Independent System Operator	Gregory Campoli		None	N/A



2	PJM Interconnection, L.L.C.	Mark Holman		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras		None	N/A
3	Anaheim Public Utilities Dept.	Dennis Schmidt		Abstain	N/A
3	APS - Arizona Public Service Co.	Jeri Freimuth		Affirmative	N/A
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
3	Austin Energy	Lisa Martin		Affirmative	N/A
3	Avista - Avista Corporation	Scott Kinney		Abstain	N/A
3	Basin Electric Power Cooperative	Jeremy Voll		Affirmative	N/A
3	BC Hydro and Power Authority	Pat Harrington		None	N/A
3	Beaches Energy Services	Steven Lancaster		Negative	Comments Submitted
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Thomas Mielnik	Darnez Gresham	Affirmative	N/A
3	Bonneville Power Administration	Rebecca Berdahl		Affirmative	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
3	City of Green Cove Springs	Mark Schultz		Negative	Comments Submitted
3	City of Leesburg	Chris Adkins		Negative	Comments Submitted
3	Clark Public Utilities	Jack Stamper		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs	Charles Morgan		Affirmative	N/A

	Utilities				
3	Con Ed - Consolidated Edison Co. of New York	Peter Yost		Affirmative	N/A
3	Dominion - Dominion Resources, Inc.	Connie Lowe		Abstain	N/A
3	DTE Energy - Detroit Edison Company	Kent Kujala		Affirmative	N/A
3	Duke Energy	Lee Schuster		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
3	Florida Municipal Power Agency	Joe McKinney		Negative	Comments Submitted
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Grand River Dam Authority	Jeff Wells		Abstain	N/A
3	Great Plains Energy - Kansas City Power and Light Co.	Jessica Tucker	Douglas Webb	Affirmative	N/A
3	Great River Energy	Brian Glover		Affirmative	N/A
3	Hydro One Networks, Inc.	Paul Malozewski	Oshani Pathirane	Abstain	N/A
3	JEA	Garry Baker		None	N/A
3	KAMO Electric Cooperative	Ted Hilmes		Affirmative	N/A
3	Lakeland Electric	Mace Hunter		Negative	Comments Submitted
3	Lincoln Electric System	Jason Fortik		Abstain	N/A
3	Los Angeles Department of Water	Mike Anctil		Affirmative	N/A

	and Power				
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A
3	Manitoba Hydro	Karim Abdel-Hadi		Affirmative	N/A
3	MEAG Power	Roger Brand	Scott Miller	None	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Abstain	N/A
3	New York Power Authority	David Rivera		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Ramon Barany		None	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Abstain	N/A
3	PNM Resources	Michael Mertz		None	N/A
3	PPL - Louisville Gas and Electric Co.	Charles Freibert		None	N/A
3	PSEG - Public Service Electric and Gas Co.	Jeffrey Mueller		Abstain	N/A
3	Public Utility District No. 1 of Okanogan County	Dale Dunckel		None	N/A
3	Puget Sound Energy, Inc.	Andrea Basinski		None	N/A
3	Sacramento Municipal Utility District	Rachel Moore	Joe Tarantino	Affirmative	N/A
3	Salt River Project	John Coggins		Affirmative	N/A
3	Santee Cooper	James Poston		Affirmative	N/A

3	SCANA - South Carolina Electric and Gas Co.	Clay Young		None	N/A
3	Seattle City Light	Dana Wheelock		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	James Frauen		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jeff Neas		Affirmative	N/A
3	Snohomish County PUD No. 1	Mark Oens		Affirmative	N/A
3	Southern Company - Alabama Power Company	R. Scott Moore		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	Marc Donaldson		Affirmative	N/A
3	Tallahassee Electric (City of Tallahassee, FL)	John Williams		Abstain	N/A
3	TECO - Tampa Electric Co.	Ronald Donahey		None	N/A
3	Tennessee Valley Authority	Ian Grant		Abstain	N/A
3	Tri-State G and T Association, Inc.	Janelle Marriott Gill		Affirmative	N/A
3	Westar Energy	Bo Jones		Affirmative	N/A
3	Xcel Energy, Inc.	Michael Ibold		Abstain	N/A
4	Alliant Energy Corporation Services, Inc.	Kenneth Goldsmith		Affirmative	N/A
4	Austin Energy	Tina Garvey		Affirmative	N/A
4	Blue Ridge Power Agency	Duane Dahlquist		None	N/A
4	City of Clewiston	Lynne Mila		Negative	Comments Submitted
4	City of New Smyrna	Tim Beyrle		Negative	Comments

	Beach Utilities Commission				Submitted
4	DTE Energy - Detroit Edison Company	Daniel Herring		Affirmative	N/A
4	FirstEnergy - Ohio Edison Company	Doug Hohlbaugh		Affirmative	N/A
4	Florida Municipal Power Agency	Carol Chinn		Negative	Comments Submitted
4	Georgia System Operations Corporation	Guy Andrews		Affirmative	N/A
4	Illinois Municipal Electric Agency	Bob Thomas		Abstain	N/A
4	Keys Energy Services	Stanley Rzad		Negative	Comments Submitted
4	Municipal Energy Agency of Nebraska	Robin Spady		Abstain	N/A
4	Public Utility District No. 1 of Snohomish County	John Martinsen		Affirmative	N/A
4	Public Utility District No. 2 of Grant County, Washington	Yvonne McMackin		Negative	Comments Submitted
4	Sacramento Municipal Utility District	Michael Ramirez	Joe Tarantino	Affirmative	N/A
4	Seattle City Light	Hao Li		Affirmative	N/A
4	Seminole Electric Cooperative, Inc.	Michael Ward		Affirmative	N/A
4	South Mississippi Electric Power Association	Steve McElhaney		None	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho		Affirmative	N/A
4	Utility Services, Inc.	Brian Evans-Mongeon		Abstain	N/A
4	WEC Energy Group, Inc.	Anthony Jankowski		Affirmative	N/A

5	AEP	Thomas Foltz		Abstain	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		None	N/A
5	APS - Arizona Public Service Co.	Stephanie Little		Affirmative	N/A
5	Austin Energy	Jeanie Doty		Affirmative	N/A
5	Avista - Avista Corporation	Steve Wenke		None	N/A
5	Basin Electric Power Cooperative	Mike Kraft		None	N/A
5	BC Hydro and Power Authority	Clement Ma		None	N/A
5	Boise-Kuna Irrigation District - Lucky Peak Power Plant Project	Mike Kukla		Affirmative	N/A
5	Bonneville Power Administration	Francis Halpin		Affirmative	N/A
5	Brazos Electric Power Cooperative, Inc.	Shari Heino		Affirmative	N/A
5	Calpine Corporation	Hamid Zakery		Abstain	N/A
5	Choctaw Generation Limited Partnership, LLLP	Rob Watson		Affirmative	N/A
5	City and County of San Francisco	Daniel Mason		Affirmative	N/A
5	City of Independence, Power and Light Department	Jim Nail		Affirmative	N/A
5	Cleco Corporation	Stephanie Huffman	Louis Guidry	Affirmative	N/A
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Abstain	N/A
5	Con Ed - Consolidated Edison Co. of New York	Brian O'Boyle		Affirmative	N/A

5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	DTE Energy - Detroit Edison Company	Jeffrey DePriest		Affirmative	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
5	Edison International - Southern California Edison Company	Michael McSpadden		Affirmative	N/A
5	Entergy - Entergy Services, Inc.	Tracey Stubbs		None	N/A
5	FirstEnergy - FirstEnergy Solutions	Robert Loy		None	N/A
5	Florida Municipal Power Agency	David Schumann		Negative	Comments Submitted
5	Great Plains Energy - Kansas City Power and Light Co.	Harold Wyble	Douglas Webb	Affirmative	N/A
5	Great River Energy	Preston Walsh		Affirmative	N/A
5	Hydro-Quebec Production	Roger Dufresne		Abstain	N/A
5	JEA	John Babik		Affirmative	N/A
5	Lakeland Electric	Jim Howard		None	N/A
5	Lincoln Electric System	Kayleigh Wilkerson		Abstain	N/A
5	Los Angeles Department of Water and Power	Kenneth Silver		None	N/A
5	Lower Colorado River Authority	Dixie Wells		Abstain	N/A
5	Luminant - Luminant Generation Company LLC	Rick Terrill		None	N/A
5	Manitoba Hydro	Yuguang Xiao		Affirmative	N/A
5	Massachusetts Municipal Wholesale Electric Company	David Gordon		Abstain	N/A

5	MEAG Power	Steven Grego	Scott Miller	None	N/A
5	Muscatine Power and Water	Mike Avesing		Affirmative	N/A
5	Nebraska Public Power District	Don Schmit		Abstain	N/A
5	New York Power Authority	Wayne Sipperly		Affirmative	N/A
5	NextEra Energy	Allen Schriver		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Michael Melvin		Affirmative	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Leo Staples		Negative	Comments Submitted
5	Oglethorpe Power Corporation	Bernard Johnson		None	N/A
5	Omaha Public Power District	Mahmood Safi		Affirmative	N/A
5	Pacific Gas and Electric Company	Alex Chua		None	N/A
5	PPL Electric Utilities Corporation	Dan Wilson		None	N/A
5	PSEG - PSEG Fossil LLC	Tim Kucey		Abstain	N/A
5	Public Utility District No. 1 of Snohomish County	Sam Nietfeld		Affirmative	N/A
5	Public Utility District No. 2 of Grant County, Washington	Alex Ybarra		Affirmative	N/A
5	Puget Sound Energy, Inc.	Lynda Kupfer		None	N/A
5	Sacramento Municipal Utility District	Susan Gill-Zobitz	Joe Tarantino	Affirmative	N/A
5	Salt River Project	Kevin Nielsen		Affirmative	N/A
5	SCANA - South	Edward Magic		None	N/A



	Carolina Electric and Gas Co.				
5	Seattle City Light	Mike Haynes		Affirmative	N/A
5	Southern Company - Southern Company Generation	William D. Shultz		Affirmative	N/A
5	Tacoma Public Utilities (Tacoma, WA)	Chris Mattson		None	N/A
5	Tallahassee Electric (City of Tallahassee, FL)	Karen Webb		Affirmative	N/A
5	Tennessee Valley Authority	Brandy Spraker		Abstain	N/A
5	Westar Energy	stephanie johnson		Affirmative	N/A
5	Xcel Energy, Inc.	David Lemmons		None	N/A
6	Ameren - Ameren Services	Robert Quinlivan		None	N/A
6	APS - Arizona Public Service Co.	Bobbi Welch		Affirmative	N/A
6	Associated Electric Cooperative, Inc.	Brian Ackermann		Affirmative	N/A
6	Austin Energy	Andrew Gallo		None	N/A
6	Berkshire Hathaway - PacifiCorp	Sandra Shaffer		Abstain	N/A
6	Bonneville Power Administration	Alex Spain		Affirmative	N/A
6	Cleco Corporation	Robert Hirschak	Louis Guidry	Affirmative	N/A
6	Colorado Springs Utilities	Shannon Fair		Affirmative	N/A
6	Con Ed - Consolidated Edison Co. of New York	Robert Winston		Affirmative	N/A
6	Duke Energy	Greg Cecil		Affirmative	N/A
6	FirstEnergy - FirstEnergy Solutions	Ann Ivanc	Richard Hoag	Affirmative	N/A

6	Florida Municipal Power Agency	Richard Montgomery		Negative	Comments Submitted
6	Florida Municipal Power Pool	Tom Reedy		Negative	Comments Submitted
6	Great Plains Energy - Kansas City Power and Light Co.	Chris Bridges	Douglas Webb	Affirmative	N/A
6	Great River Energy	Donna Stephenson	Michael Brytowski	Affirmative	N/A
6	Lower Colorado River Authority	Michael Shaw		Abstain	N/A
6	Manitoba Hydro	Blair Mukanik		Affirmative	N/A
6	Muscatine Power and Water	Ryan Streck		Affirmative	N/A
6	New York Power Authority	Shivaz Chopra		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Abstain	N/A
6	NiSource - Northern Indiana Public Service Co.	Joe O'Brien		Affirmative	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Jerry Nottnagel		None	N/A
6	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
6	Platte River Power Authority	Carol Ballantine		Abstain	N/A
6	PPL - Louisville Gas and Electric Co.	OELKER LINN		None	N/A
6	Sacramento Municipal Utility District	Diane Clark	Joe Tarantino	Affirmative	N/A
6	Salt River Project	William Abraham	Chris Janick	Affirmative	N/A
6	Santee Cooper	Michael Brown		Affirmative	N/A
6	Seattle City Light	Charles Freeman		Affirmative	N/A

6	Seminole Electric Cooperative, Inc.	Trudy Novak		Affirmative	N/A
6	Snohomish County PUD No. 1	Kenn Backholm		Affirmative	N/A
6	Southern Company - Southern Company Generation and Energy Marketing	John J. Ciza		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Rick Applegate		Affirmative	N/A
6	Talen Energy Marketing, LLC	Elizabeth Davis		Affirmative	N/A
6	Tennessee Valley Authority	Marjorie Parsons		Abstain	N/A
6	Westar Energy	Tiffany Lake		Affirmative	N/A
8	David Kiguel	David Kiguel		Affirmative	N/A
9	City of Vero Beach	Ginny Beigel		Negative	Comments Submitted
9	Commonwealth of Massachusetts Department of Public Utilities	Donald Nelson		Affirmative	N/A
10	Florida Reliability Coordinating Council	Peter Heidrich		Affirmative	N/A
10	Midwest Reliability Organization	Russel Mountjoy		Affirmative	N/A
10	Northeast Power Coordinating Council	Guy V. Zito		Affirmative	N/A
10	ReliabilityFirst	Anthony Jablonski		Affirmative	N/A
10	SERC Reliability Corporation	Joe Spencer		Affirmative	N/A
10	Southwest Power Pool Regional Entity	Bob Reynolds		Abstain	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Abstain	N/A

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# Survey Report

## Survey Details

**Name** 2010-04.1 MOD-031 FERC Order No. 804 Directives | MOD-031-2

**Description**

**Start Date** 7/31/2015

**End Date** 9/18/2015

### Associated Ballots

2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 IN 1 ST

2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 Non-binding Poll IN 1 NB

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## Survey Questions

***1. The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.***

Yes

No

---

## Responses By Question

***1. The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.***

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Thomas Foltz - AEP - 5 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC**

**Group Information**

Group Name: ISO Standards Review Committee

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Charles Yeung	SPP	SPP	2
Ben Li	IESO	NPCC	2
Mark Holman	PJM	RFC	2
Kathleen Goodman	ISONE	NPCC	2
Greg Campoli	NYISO	NPCC	2
Ali Miremadi	CAISO	WECC	2
Terry Bilke	MISO	RFC	2

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Albert DiCaprio	2
<b>Entity</b>	<b>Region(s)</b>
PJM Interconnection, L.L.C.	RFC

**Selected Answer:** Yes

**Answer Comment:** The ISO/RTO Standards Review Committee (ERCOT obtaining) agrees with the proposed revisions.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** No

**Answer Comment:**

While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Gul Khan - Gul Khan On Behalf of: Rod Kinard, Oncor Electric Delivery, 1**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** No

**Answer Comment:**

Please refer to ERCOT's responses provided in response to the MOD-031-1 survey.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**John Fontenot - Bryan Texas Utilities - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Bob Thomas - Illinois Municipal Electric Agency - 4 -**

**Selected Answer:** No

**Answer Comment:**

Given the stongly supported rationale for deactivating the LSE registration function under the Risk-Based Registration initiative, Requirement 2 and Requirement 4 should be revised to remove the reference to LSE.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Teresa Czyz - Teresa Czyz - -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO**

**Group Information**

Group Name: MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Shannon Weaver	Midwest ISO Inc.	MRO	2
Mike Brytowski	Great River Energy	MRO	1,3,5,6
Brad Perrett	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3,5,6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4,5,6
Tony Eddleman	Nebraska Public Power District	MRO	1,3,5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Emily Rousseau	1,2,3,4,5,6
<b>Entity</b>	<b>Region(s)</b>
MRO	MRO

**Selected Answer:** Yes

**Answer Comment:**

The NSRF recommends that R4 bulleted items be updated to reflect the below changes. Our biggest concern is that all three bulleted items must be accomplished since there is an “and” at the end of the first and second bullet. The new wording allows entities the flexibility, which the NSRF believes is the intent of the bulleted items. The NSRF recommends:

- Shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement, unless,
- The requested data, if provided, would conflict with Applicable Entity’s confidentiality, regulatory, or security requirements
- Shall not be required to alter the format in which it maintains or uses the data.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Tom Reedy - Florida Municipal Power Pool - 6 -**

**Selected Answer:** No

**Answer Comment:**

While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Elizabeth Axson - Elizabeth Axson On Behalf of: christina bigelow, Electric Reliability Council of Texas, Inc., 2**

**Selected Answer:**

**Answer Comment:**

While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not

collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

Christina Bigelow, Electric Reliability Council of Texas, Inc., 2, 8/31/2015

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

**Group Information**

Group Name: NCP and Nash

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Louis Slade	Dominion - NERC Compliance Policy	NA - Not Applicable	1,3,5,6
Randi Heise	Dominion - NERC Compliance Policy	NA - Not Applicable	1,3,5,6
Larry Nash	Dominion - Electric Transmission Compliance	SERC	1,3,5,6

**Voter Information**

**Voter** **Segment**

Connie Lowe 3

**Entity** **Region(s)**

Dominion - Dominion Resources, Inc.

**Selected Answer:** Yes

**Answer Comment:**

Given that NERC has requested removal of LSE (docket # RR15-4-000) from NERC Registry Criteria, Dominion suggests removal in this standard.

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Chantal Mazza - Hydro-Québec TransEnergie - 2 - NA - Not Applicable**

**Selected Answer:** Yes

**Answer Comment:**

Additional comments :

- Hydro-Québec TransÉnergie's Compliance staff recently questioned a TP, BA, LSE and an entity from a neighbouring Interconnection on how to calculate Integrated demands (see 1.3.1 and 1.3.2 of MOD-031) and received 4 different answers. We recommend adding these terms to the NERC glossary with a mathematical formula or adding the formulae to an Appendix of MOD-031.
- Requested change to Implementation Plan:

Considering the nature of proposed changes to MOD-031 e.g. ensuring that the obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations, we believe that version 2 does not require any delay for implementation and is easier to implement than version 1. Therefore, we suggest that the implementation calendar be modified to read:

"MOD -031 - 2 shall become effective as

The later of the effective date of MOD 30  
quarter after the date that this standard is approved by applicable regulatory  
authorities or as otherwise provided for in a jurisdiction where approval by an  
applicable governmental authority is required for a standard to go into effect.  
Where approval by an applicable governmental authority is not required, the  
standard shall become effective on the later of the effective date of MOD  
or the first day of the first calendar quarter after the date the standard is adopted  
by the NERC Board of Trustees or as otherwise provided for in that jurisdiction."

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Bob Solomon - Hoosier Energy Rural Electric Cooperative, Inc. - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

## Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC

### Group Information

Group Name: NPCC--Project 2010-04.1 MOD-031 FERC Order No. 804 Directives - MOD-031-2

Group Member Name	Entity	Region	Segments
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8
Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5

Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Robert Pellegrini	The United Illuminating Company	NPCC	1
Kathleen Goodman	ISO - New England	NPCC	2
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Lee Pedowicz	10
<b>Entity</b>	<b>Region(s)</b>
Northeast Power Coordinating Council	NPCC

**Selected Answer:** Yes

**Answer Comment:** Requirement is spelled incorrectly in the opening sentence of the second paragraph in the Rationale for R4.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Jason Smith - SPP - 2 - SPP**

**Group Information**

Group Name: SPP Standards Review Group

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Shannon Mickens	Southwest Power Pool	SPP	2
Jason Smith	Southwest Power Pool	SPP	2
Timothy Owens	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Jonathan Hayes	Southwest Power Pool	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5
James Nail	City of Independence, Missouri	SPP	3,5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Jason Smith	2
<b>Entity</b>	<b>Region(s)</b>
SPP	SPP

**Selected Answer:** Yes

**Answer Comment:**

We disagree with the proposed change to strike the word “collected” and change it to “listed” in R3. The data in R1.3 – R1.5 is allowed to be determined to be collected by Planning Coordinator and Balancing Authority “as necessary” per R1. By changing the word in Requirement R3 to “listed”, the data is inferred to be ‘forced to be collected’ since it is in the R1.3-1.5 list rather than determined to be ‘necessary to be collected’.

We would also suggest removing the term ‘Load-Serving Entity’ from the applicability section of the requirement.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Information**

Group Name: Duke Energy

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Doug Hils	Duke Energy	RFC	1
Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Colby Bellville	1,3,5,6
<b>Entity</b>	<b>Region(s)</b>
Duke Energy	FRCC,SERC,RFC

**Selected Answer:** Yes

**Answer Comment:** Duke Energy agrees with the proposed changes, and thanks the drafting team for their efforts.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** Yes

**Answer Comment:**

Texas RE noticed the VSLs for R3 references R2, rather than the requirement language which references "R1 Parts 1.3 through 1.5".

Texas RE is concerned the terms listed under R4, "confidentiality, regulatory, or security requirements", are vague. This language allows a registered entity to fail to respond to a data request by citing any source of confidentiality, regulatory, or security requirements, regardless of its legitimacy or importance. Texas RE request that the SDT provide examples of confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement that would prevent an Applicable Entity from providing data included in parts 1.3  
R1. -1.!

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Michiko Sell - Public Utility District No. 2 of Grant County, Washington - 1 -**

**Selected Answer:** Yes

**Answer Comment:**

However, the use of "Applicable Entity" throughout the Standard is problematic as it is not a NERC defined term.

**Document Name:**

**Likes:** 0

**Dislikes:** 0



**Oshani Pathirane - Oshani Pathirane On Behalf of: Paul Malozewski, Hydro One Networks, Inc., 1, 3**

**Selected Answer:** No

**Answer Comment:**

Hydro One Networks Inc. suggests that the wording “applicable entity in its area” (R1), and “applicable Regional Entity” (R3) be revised to add more clarity. The current wording is also ambiguous in specifying what data is required, and the requirement may be left open to any requests for data collection. For clarity, the standard should also specify minimum requirements. Further, the standard’s applicability to Load Serving Entities should be removed, given NERC’s intention to remove this functional entity from its list of available functional registrations.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable**

**Group Information**

Group Name: ACES Standards Collaborators

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6
John Shaver	Arizona Electric Power Cooperative, Inc.	WECC	4,5
John Shaver	Southwest Transmission Cooperative, Inc.	WECC	1
Bill Watson	Old Dominion Electric Cooperative	SERC	3,4
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5

**Voter Information**

<b>Voter</b>	<b>Segment</b>
Brian Van Gheem	6
<b>Entity</b>	<b>Region(s)</b>
ACES Power Marketing	NA - Not Applicable

**Selected Answer:** Yes

**Answer Comment:**

We appreciate the SDT's efforts on clarifying the obligations to provide data to Regional Entities and the obligations of an applicable entity upon receipt of a data request seeking confidential information. We agree the proposed modifications provide sufficient clarity.

**Document Name:**

**Likes:** 0

**Dislikes:** 0

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:** Yes

**Answer Comment:**

**Document Name:**

**Likes:** 0

**Dislikes:** 0

## Consideration of Comments

**Project Name:** 2010-04.1 MOD-031 FERC Order No. 804 Directives | MOD-031-2

**Comment Period Start Date:** 7/31/2015

**Comment Period End Date:** 9/18/2015

**Associated Ballot:** 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 IN 1 ST

There were 28 responses, including comments from approximately 93 different people from approximately 64 different companies representing 9 of the 10 Industry Segments as shown on the following pages.

All comments submitted can be reviewed in their original format on the [project page](#).

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 Director of Standards, [Howard Gugel](#) (via email) or at (404) 446-9693.

## Questions

1. **The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.**

### The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

**1. The SDT has modified MOD-031-1 Requirements R3 and R4 to provide clarity regarding certain obligations to provide data to the Regional Entity and the obligations of an applicable entity upon receipt of a data request seeking confidential information. Do you agree that the proposed modifications provide sufficient clarity? If not, please explain below and provide a proposed solution.**

<p><b>John Fontenot - Bryan Texas Utilities - 1 -</b></p> <p><b>Selected Answer:</b> Yes</p>																																
<p><b>Thomas Foltz - AEP - 5 -</b></p> <p><b>Selected Answer:</b> Yes</p>																																
<p><b>Albert DiCaprio - PJM Interconnection, L.L.C. - 2 - RFC</b></p> <p><b>Group Name:</b> ISO Standards Review Committee</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">Group Member Name</th> <th style="text-align: left;">Entity</th> <th style="text-align: left;">Region</th> <th style="text-align: left;">Segments</th> </tr> </thead> <tbody> <tr> <td>Charles Yeung</td> <td>SPP</td> <td>SPP</td> <td>2</td> </tr> <tr> <td>Ben Li</td> <td>IESO</td> <td>NPCC</td> <td>2</td> </tr> <tr> <td>Mark Holman</td> <td>PJM</td> <td>RFC</td> <td>2</td> </tr> <tr> <td>Kathleen Goodman</td> <td>ISONE</td> <td>NPCC</td> <td>2</td> </tr> <tr> <td>Greg Campoli</td> <td>NYISO</td> <td>NPCC</td> <td>2</td> </tr> <tr> <td>Ali Miremadi</td> <td>CAISO</td> <td>WECC</td> <td>2</td> </tr> <tr> <td>Terry Bilke</td> <td>MISO</td> <td>RFC</td> <td>2</td> </tr> </tbody> </table>	Group Member Name	Entity	Region	Segments	Charles Yeung	SPP	SPP	2	Ben Li	IESO	NPCC	2	Mark Holman	PJM	RFC	2	Kathleen Goodman	ISONE	NPCC	2	Greg Campoli	NYISO	NPCC	2	Ali Miremadi	CAISO	WECC	2	Terry Bilke	MISO	RFC	2
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Ali Miremadi	CAISO	WECC	2																													
Terry Bilke	MISO	RFC	2																													

**Selected Answer:** Yes

**Answer Comment:** The ISO/RTO Standards Review Committee (ERCOT obtaining) agrees with the proposed revisions.  
**Thank you for your affirmative response.**

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

**Selected Answer:** No

**Answer Comment:** While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.



The data specific to this standard is for the collection and reporting of data necessary for reliability analysis. The scope of the data is consistent with the current MOD standards that will be replaced by this standard. The SDT believes that if the entity does not have the data requested the entity would be required to collect the data and provide such data to the Regional Entity under this requirement.

**Gul Khan - Gul Khan On Behalf of: Rod Kinard, Oncor Electric Delivery, 1**

**Selected Answer:** Yes

**Nick Vtyurin - Manitoba Hydro - 1,3,5,6 - MRO**

**Selected Answer:** Yes

**Leonard Kula - Independent Electricity System Operator - 2 -**

**Selected Answer:** Yes

**Amy Casuscelli - Xcel Energy, Inc. - 1,3,5,6 - MRO,WECC,SPP**

**Selected Answer:** Yes

**christina bigelow - Electric Reliability Council of Texas, Inc. - 2 -**

<p><b>Selected Answer:</b></p> <p><b>Answer Comment:</b></p>	<p>No</p> <p>Please refer to ERCOT's responses provided in response to the MOD-031-1 survey.  Please see our response to ERCOT's comments.</p>
<p><b>Bob Thomas - Illinois Municipal Electric Agency - 4 -</b></p> <p><b>Selected Answer:</b></p> <p><b>Answer Comment:</b></p>	
<p><b>Teresa Czyz - Teresa Czyz - -</b></p> <p><b>Selected Answer:</b></p>	<p>No</p> <p>Given the stongly supported rationale for deactivating the LSE registration function under the Risk-Based Registration initiative, Requirement 2 and Requirement 4 should be revised to remove the reference to LSE.  The deactivation of the LSE registration is not final at this point in time. When and if the deactivation occurs all standards that are applicable to an LSE will be re-evaluated.</p>
<p><b>Emily Rousseau - MRO - 1,2,3,4,5,6 - MRO</b></p>	

**Group Name:** MRO-NERC Standards Review Forum (NSRF)

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Joe Depoorter	Madison Gas & Electric	MRO	3,4,5,6
Amy Casucelli	Xcel Energy	MRO	1,3,5,6
Chuck Lawrence	American Transmission Company	MRO	1
Chuck Wicklund	Otter Tail Power Company	MRO	1,3,5
Theresa Allard	Minnkota Power Cooperative, Inc	MRO	1,3,5,6
Dave Rudolph	Basin Electric Power Cooperative	MRO	1,3,5,6
Kayleigh Wilkerson	Lincoln Electric System	MRO	1,3,5,6
Jodi Jenson	Western Area Power Administration	MRO	1,6
Larry Heckert	Alliant Energy	MRO	4
Mahmood Safi	Omaha Public Utility District	MRO	1,3,5,6
Shannon Weaver	Midwest ISO Inc.	MRO	2

Mike Brytowski	Great River Energy	MRO	1,3 ,5, 6
Brad Perrett	Minnesota Power	MRO	1,5
Scott Nickels	Rochester Public Utilities	MRO	4
Terry Harbour	MidAmerican Energy Company	MRO	1,3 ,5, 6
Tom Breene	Wisconsin Public Service Corporation	MRO	3,4 ,5, 6
Tony Eddleman	Nebraska Public Power District	MRO	1,3 ,5

**Selected Answer:**

Yes

**Answer Comment:**

The NSRF recommends that R4 bulleted items be updated to reflect the below changes. Our biggest concern is that all three bulleted items must be accomplished since there is an “and” at the end of the first and second bullet. The new wording allows entities the flexibility, which the NSRF believes is the intent of the bulleted items. The NSRF recommends:

- Shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement, unless,
  - The requested data, if provided, would conflict with Applicable Entity’s confidentiality, regulatory, or security requirements
  - Shall not be required to alter the format in which it maintains or uses the data.

The SDT modified the requirement to address your concerns.

**Tom Reedy - Florida Municipal Power Pool - 6 -****Selected Answer:** No

**Answer Comment:** While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

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**Elizabeth Axson - Elizabeth Axson On Behalf of: christina bigelow, Electric Reliability Council of Texas, Inc., 2**

**Selected Answer:**

**Answer Comment:**

While the revisions provide clarity about the provision of data, they create ambiguity regarding how a BA or RC as the responsible entity responds to a data request for data that they do not and have not collected under related requirements in MOD-031. More specifically, Requirement R3 requires a BA or PC to provide data listed in Requirements R1.3 through R1.5 in response to a request by a Regional Entity; however, it does not consider that such entity might not collect all listed data. Accordingly, Requirement R3 could be read to require an entity to collect such data (whether they need to do so or not) solely for the purposes of responding to a Regional Entity request, which activity would be administratively burdensome and would provide no benefit to reliability - especially considering that the Regional Entity could directly request data not collected by a BA or PC from those entities from whom the BA or PC would be required to collect the data.

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Regional Entity under this requirement.

Christina Bigelow, Electric Reliability Council of Texas, Inc., 2, 8/31/2015

**Molly Devine - IDACORP - Idaho Power Company - 1 -**

**Selected Answer:** Yes

**Connie Lowe - Dominion - Dominion Resources, Inc. - 3 -**

**Group Name:** NCP and Nash

Group Member Name	Entity	Region	Segments
Louis Slade	Dominion - NERC Compliance Policy	NA - Not Applicable	1,3,5,6
Randi Heise	Dominion - NERC Compliance Policy	NA - Not Applicable	1,3,5,6
Larry Nash	Dominion - Electric Transmission Compliance	SERC	1,3,5,6

**Selected Answer:**

Yes

**Answer Comment:**

Given that NERC has requested removal of LSE (docket # RR15-4-000) from NERC Registry Criteria, Dominion suggests removal in this standard.

The deactivation of the LSE registration is not final at this point in time. When and if the deactivation occurs all standards that are applicable to an LSE will be re-evaluated.

**Chantal Mazza - Hydro-Québec TransÉnergie - 2 - NA - Not Applicable****Selected Answer:**

Yes

**Answer Comment:**

Additional comments :

- Hydro-Québec TransÉnergie's Compliance staff recently questioned a TP, BA, LSE and an entity from a neighbouring Interconnection on how to calculate Integrated demands (see 1.3.1 and 1.3.2 of MOD-031) and received 4 different answers. We recommend adding these terms to the NERC glossary with a mathematical formula or adding the formulae to an Appendix of MOD-031.

The SDT believes that your suggested modification is outside the scope of the SAR created for development of this draft of the standard. The SDT encourages you to develop a SAR to address your issue and submit it to NERC.

- Requested change to Implementation Plan:



Considering the nature of proposed changes to MOD-031 e.g. ensuring that the obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations, we believe that version 2 does not require any delay for implementation and is easier to implement than version 1. Therefore, we suggest that the implementation calendar be modified to read:

"MOD-031-2 shall become effective as follows:

The later of the effective date of MOD-031-1 or the first day of the first calendar quarter after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction."

The SDT thanks you for your suggested modification to the effective date. However, the SDT does not believe that it has industry consensus to support modifying the effective date.

**Bob Solomon - Hoosier Energy Rural Electric Cooperative, Inc. - 1 -**

**Selected Answer:** Yes

**Lee Pedowicz - Northeast Power Coordinating Council - 10 - NPCC**

**Group Name:** NPCC--Project 2010-04.1 MOD-031 FERC Order No. 804 Directives - MOD-031-2

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Alan Adamson	New York State Reliability Council, LLC	NPCC	10
David Burke	Orange and Rockland Utilities Inc.	NPCC	3
Greg Campoli	New York Independent System Operator	NPCC	2
Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10
Mark Kenny	Northeast Utilities	NPCC	1
Helen Lainis	Independent Electricity System Operator	NPCC	2
Rob Vance	New Brunswick Power Corporation	NPCC	9
Paul Malozewski	Hydro One Networks Inc.	NPCC	1
Bruce Metruck	New York Power Authority	NPCC	6
Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10
David Ramkalawan	Ontario Power Generation, Inc.	NPCC	5
Brian Robinson	Utility Services	NPCC	8

Wayne Sipperly	New York Power Authority	NPCC	5
Edward Bedder	Orange and Rockland Utilities Inc.	NPCC	1
Michael Jones	National Grid	NPCC	1
Brian Shanahan	National Grid	NPCC	1
Glen Smith	Entergy Services, Inc.	NPCC	5
RuiDa Shu	Northeast Power Coordinating Council	NPCC	10
Connie Lowe	Dominion Resources Services, Inc.	NPCC	5
Guy Zito	Northeast Power Coordinating Council	NPCC	10
Silvia Parada Mitchell	NextEra Energy, LLC	NPCC	5
Robert Pellegrini	The United Illuminating Company	NPCC	1
Kathleen Goodman	ISO - New England	NPCC	2
Kelly Dash	Consolidated Edison Co. of New York, Inc.	NPCC	1
Michael Forte	Consolidated Edison Co. of New York, Inc.	NPCC	1
Brian O'Boyle	Consolidated Edison Co. of New York, Inc.	NPCC	8
Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3
Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1
Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1

**Selected Answer:**

Yes

**Answer Comment:**

Requirement is spelled incorrectly in the opening sentence of the second paragraph in the Rationale for R4.

The SDT thanks you for your affirmative response and suggested correction. The SDT has made the necessary change to the rationale box for Requirement R4.

**Jason Smith - SPP - 2 - SPP**

**Group Name:** SPP Standards Review Group

Group Member Name	Entity	Region	Segments
Shannon Mickens	Southwest Power Pool	SPP	2
Jason Smith	Southwest Power Pool	SPP	2
Timothy Owens	Nebraska Public Power District	MRO	1,3,5
Ellen Watkins	Sunflower Electric Power Corporation	SPP	1
Mahmood Safi	Omaha Public Power District	MRO	1,3,5
Jonathan Hayes	Southwest Power Pool	SPP	2
Mike Kidwell	Empire District Electric Company	SPP	1,3,5
James Nail	City of Independence, Missouri	SPP	3,5

**Selected Answer:**

Yes

**Answer Comment:**

We disagree with the proposed change to strike the word “collected” and change it to “listed” in R3. The data in R1.3 – R1.5 is allowed to be determined to be collected by Planning Coordinator and Balancing Authority “as necessary” per R1. By changing the word in Requirement R3 to “listed”, the data is inferred to be ‘forced to be collected’ since it is in the R1.3-1.5 list rather than determined to be ‘necessary to be collected’.

The early part of the requirement referencing Part 1.3 through Part 1.5 is the possible scope of the request. The request, later in the requirement, provides the actual scope of what an entity must provide.

We would also suggest removing the term ‘Load-Serving Entity’ from the applicability section of the requirement.

The deactivation of the LSE registration is not final at this point in time. When and if the deactivation occurs all standards that are applicable to an LSE will be re-evaluated.

**Colby Bellville - Duke Energy - 1,3,5,6 - FRCC,SERC,RFC**

**Group Name:** Duke Energy

Group Member Name	Entity	Region	Segments
Doug Hils	Duke Energy	RFC	1

Lee Schuster	Duke Energy	FRCC	3
Dale Goodwine	Duke Energy	SERC	5
Greg Cecil	Duke Energy	RFC	6

**Selected Answer:** Yes

**Answer Comment:** **Duke Energy agrees with the proposed changes, and thanks the drafting team for their efforts.**  
**The SDT thanks you for your affirmative response.**

**Rachel Coyne - Texas Reliability Entity, Inc. - 10 -**

**Selected Answer:** Yes

**Answer Comment:** Texas RE noticed the VSLs for R3 references R2, rather than the requirement language which references “R1 Parts 1.3 through 1.5”.  
**The SDT has made the correction.**

Texas RE is concerned the terms listed under R4, “confidentiality, regulatory, or security requirements”, are vague.  
**Given the myriad of confidentiality, regulatory and security requirements, the standard drafting team determined that it was not appropriate to detail the exact nature of those requirements in the standard. However, under Part 4.1, the entity must provide a written response justifying the refusal to provide requested data. If, in the judgment of an auditor, the**

justification was not legitimate, the entity may have violated the standard.

This language allows a registered entity to fail to respond to a data request by citing any source of confidentiality, regulatory, or security requirements, regardless of its legitimacy or importance. Texas RE request that the SDT provide examples of confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement that would prevent an Applicable Entity from providing data included in parts 1.3-1.5 of Requirement R1.

As an example of confidentiality provisions, the SDT points to the EEI response to the FERC NOPR for MOD-031-1.

**Michiko Sell - Public Utility District No. 2 of Grant County, Washington - 1 -**

**Selected Answer:** Yes

**Answer Comment:** However, the use of "Applicable Entity" throughout the Standard is problematic as it is not a NERC defined term. The SDT thanks you for your affirmative response. You are correct that the term Applicable Entity is not defined in the NERC Glossary of Terms but it is defined within this standard in Requirement R1 Part 1.1.

**Oshani Pathirane - Oshani Pathirane On Behalf of: Paul Malozewski, Hydro One Networks, Inc., 1, 3**

**Selected Answer:**

No

**Answer Comment:**

Hydro One Networks Inc. suggests that the wording “applicable entity in its area” (R1), and “applicable Regional Entity” (R3) be revised to add more clarity.

With regards to use of the term “applicable entity”, the term is further defined in Requirement R1 Part 1.1.

The term “applicable Regional Entity” is referencing the requesting Regional Entity.

The current wording is also ambiguous in specifying what data is required, and the requirement may be left open to any requests for data collection. For clarity, the standard should also specify minimum requirements.

The data that may be requested under this standard is defined and bounded in Requirement R1. “Any or all” of the data in Requirement R1 Part 1.3 through Part 1.5 may be requested. Relating to the minimum requirement, there is no requirement to collect data if it is not determined to be necessary by the requesting entity.

Further, the standard’s applicability to Load Serving Entities should be removed, given NERC’s intention to remove this functional entity from its list of available functional registrations.

The deactivation of the LSE registration is not final at this point in time. When and if the deactivation occurs all standards that are applicable to an LSE will be re-evaluated.



**Brian Van Gheem - ACES Power Marketing - 6 - NA - Not Applicable****Group Name:** ACES Standards Collaborators

<b>Group Member Name</b>	<b>Entity</b>	<b>Region</b>	<b>Segments</b>
Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	RFC	1
Ginger Mercier	Prairie Power, Inc.	SERC	1,3
Bill Hutchison	Southern Illinois Power Cooperative	SERC	1
Michael Brytowski	Great River Energy	MRO	1,3,5,6
John Shaver	Arizona Electric Power Cooperative, Inc.	WECC	4,5
John Shaver	Southwest Transmission Cooperative, Inc.	WECC	1
Bill Watson	Old Dominion Electric Cooperative	SERC	3,4
Shari Heino	Brazos Electric Power Cooperative, Inc.	TRE	1,5
Chip Koloini	Golden Spread Electric Cooperative, Inc.	SPP	5

**Selected Answer:** Yes

**Answer Comment:**

We appreciate the SDT's efforts on clarifying the obligations to provide data to Regional Entities and the obligations of an applicable entity upon receipt of a data request seeking confidential information. We agree the proposed modifications provide sufficient clarity.

The SDT thanks you for your affirmative response.

**Andrea Jessup - Bonneville Power Administration - 1,3,5,6 - WECC**

**Selected Answer:**

Yes

**End of Report**

## Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### Description of Current Draft

This is the first posting of the proposed revised standard. This proposed draft standard will be posted for a 45-day comment period and 10-day initial ballot.

Completed Actions	Date
Standards Committee approved SAR for posting	April 15, 2015
SAR posted for a 30-day informal comment period	April 16, 2015

Anticipated Actions	Date
45-day formal comment period with initial ballot	August/September 2015
Final ballot	October 2015
NERC Board adoption	November 2015

### **New or Modified Terms Used in NERC Reliability Standards**

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard.

**Term:** None

### A. Introduction

1. **Title: Demand and Energy Data**
2. **Number: MOD-031-2**
3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

- 4.1. **Functional Entities:**

- 4.1.1 Planning Authority and Planning Coordinator (hereafter collectively referred to as the “Planning Coordinator”)

This proposed standard combines “Planning Authority” with “Planning Coordinator” in the list of applicable functional entities. The NERC Functional Model lists “Planning Coordinator” while the registration criteria list “Planning Authority,” and they are not yet synchronized. Until that occurs, the proposed standard applies to both “Planning Authority” and “Planning Coordinator.”

- 4.1.2 Transmission Planner

- 4.1.3 Balancing Authority

- 4.1.4 Resource Planner

- 4.1.5 Load-Serving Entity

- 4.1.6 Distribution Provider

5. **Effective Date**

- 5.1. See the MOD-031-2 Implementation Plan.

6. **Background:**

To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management

performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

### B. Requirements and Measures

- R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- 1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data (“Applicable Entities”).
  - 1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).
  - 1.3.** A request to provide any or all of the following actual data, as necessary:
    - 1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.
    - 1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.
      - 1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.
    - 1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.
    - 1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any,

activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

- 1.4.** A request to provide any or all of the following forecast data, as necessary:
  - 1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.
  - 1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.
  - 1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.
  - 1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.
  - 1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.
- 1.5.** A request to provide any or all of the following summary explanations, as necessary:
  - 1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.
  - 1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.
  - 1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.
  - 1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.
  - 1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.
- M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.
- R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.
- R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**Rationale for R4:** This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

- R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or



otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall not be required to alter the format in which it maintains or uses the data;
- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; unless providing the requested data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements

**4.1.** If the Applicable Entity does not provide data requested because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

Spot Checking

Compliance Investigation

Self-Reporting

Complaint

#### 1.4. Additional Compliance Information

None

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Long-term Planning	Medium	N/A	N/A	N/A	The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data.
R2	Long-term Planning	Medium	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5</p>

			<p>did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>OR The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>
R3	Long-term Planning	Medium	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 75 days</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 80 days</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data requested, but did so after 85 days</p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data requested prior to 91 days</p>

			from the date of request but prior to 81 days from the date of the request.	from the date of request but prior to 86 days from the date of the request.	from the date of request but prior to 91 days from the date of the request.	or more from the date of the request.
R4	Long-term Planning	Medium	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written request.</p>	<p>The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written request.</p>

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	May 6, 2014	Adopted by the NERC Board of Trustees.	
1	February 19, 2015	FERC order approving MOD-031-1	

## Application Guidelines

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### Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### Rationale for R1:

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

#### Rationale for R2:

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

#### Rationale for R3:

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

#### Rationale for R4:

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the provisions outlined in Requirement R4 below. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

## Standard Development Timeline

This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.

### Description of Current Draft

This is the first posting of the proposed revised standard. This proposed draft standard will be posted for a 45-day comment period and 10-day initial ballot.

Completed Actions	Date
Standards Committee approved SAR for posting	April 15, 2015
SAR posted for a 30-day informal comment period	April 16, 2015

Anticipated Actions	Date
45-day formal comment period with initial ballot	August/September 2015
Final ballot	October 2015
NERC Board adoption	November 2015



### **New or Modified Terms Used in NERC Reliability Standards**

This section includes all new or modified terms used in the proposed standard that will be included in the *Glossary of Terms Used in NERC Reliability Standards* upon applicable regulatory approval. Terms used in the proposed standard that are already defined and are not being modified can be found in the *Glossary of Terms Used in NERC Reliability Standards*. The new or revised terms listed below will be presented for approval with the proposed standard.

**Term:** None

## A. Introduction

1. **Title: Demand and Energy Data**
2. **Number: MOD-031-2**
3. **Purpose:** To provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data.

4. **Applicability:**

- 4.1. **Functional Entities:**

- 4.1.1 Planning Authority and Planning Coordinator (hereafter collectively referred to as the “Planning Coordinator”)

This proposed standard combines “Planning Authority” with “Planning Coordinator” in the list of applicable functional entities. The NERC Functional Model lists “Planning Coordinator” while the registration criteria list “Planning Authority,” and they are not yet synchronized. Until that occurs, the proposed standard applies to both “Planning Authority” and “Planning Coordinator.”

- 4.1.2 Transmission Planner
    - 4.1.3 Balancing Authority
    - 4.1.4 Resource Planner
    - 4.1.5 Load-Serving Entity
    - 4.1.6 Distribution Provider

5. **Effective Date**

- 5.1. See the MOD-031-2 Implementation Plan.

6. **Background:**

To ensure that various forms of historical and forecast Demand and energy data and information is available to the parties that perform reliability studies and assessments, authority is needed to collect the applicable data.

The collection of Demand, Net Energy for Load and Demand Side Management data requires coordination and collaboration between Planning Authorities (Planning Coordinators), Transmission and Resource Planners, Load-Serving Entities and Distribution Providers. Ensuring that planners and operators have access to complete and accurate load forecasts – as well as the supporting methods and assumptions used to develop these forecasts – enhances the reliability of the Bulk Electric System. Consistent documenting and information sharing activities will also improve efficient planning practices and support the identification of needed system reinforcements. Furthermore, collection of actual Demand and Demand Side Management

performance during the prior year will allow for comparison to prior forecasts and further contribute to enhanced accuracy of load forecasting practices.

Data provided under this standard is generally considered confidential by Planning Coordinators and Balancing Authorities receiving the data. Furthermore, data reported to a Regional Entity is subject to the confidentiality provisions in Section 1500 of the North American Electric Reliability Corporation Rules of Procedure and is typically aggregated with data of other functional entities in a non-attributable manner. While this standard allows for the sharing of data necessary to perform certain reliability studies and assessments, any data received under this standard for which an applicable entity has made a claim of confidentiality should be maintained as confidential by the receiving entity.

## **B. Requirements and Measures**

- R1.** Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area. The data request shall include: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- 1.1.** A list of Transmission Planners, Balancing Authorities, Load Serving Entities, and Distribution Providers that are required to provide the data (“Applicable Entities”).
  - 1.2.** A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).
  - 1.3.** A request to provide any or all of the following actual data, as necessary:
    - 1.3.1.** Integrated hourly Demands in megawatts for the prior calendar year.
    - 1.3.2.** Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.
      - 1.3.2.1.** If the annual peak hour actual Demand varies due to weather-related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather normalized annual peak hour actual Demand for the prior calendar year.
    - 1.3.3.** Monthly and annual Net Energy for Load in gigawatthours for the prior calendar year.
    - 1.3.4.** Monthly and annual peak hour controllable and dispatchable Demand Side Management under the control or supervision of the System Operator in megawatts for the prior calendar year. Three values shall be reported for each hour: 1) the committed megawatts (the amount under control or supervision), 2) the dispatched megawatts (the amount, if any,

activated for use by the System Operator), and 3) the realized megawatts (the amount of actual demand reduction).

- 1.4.** A request to provide any or all of the following forecast data, as necessary:
  - 1.4.1.** Monthly peak hour forecast Total Internal Demands in megawatts for the next two calendar years.
  - 1.4.2.** Monthly forecast Net Energy for Load in gigawatthours for the next two calendar years.
  - 1.4.3.** Peak hour forecast Total Internal Demands (summer and winter) in megawatts for ten calendar years into the future.
  - 1.4.4.** Annual forecast Net Energy for Load in gigawatthours for ten calendar years into the future.
  - 1.4.5.** Total and available peak hour forecast of controllable and dispatchable Demand Side Management (summer and winter), in megawatts, under the control or supervision of the System Operator for ten calendar years into the future.
- 1.5.** A request to provide any or all of the following summary explanations, as necessary:
  - 1.5.1.** The assumptions and methods used in the development of aggregated Peak Demand and Net Energy for Load forecasts.
  - 1.5.2.** The Demand and energy effects of controllable and dispatchable Demand Side Management under the control or supervision of the System Operator.
  - 1.5.3.** How Demand Side Management is addressed in the forecasts of its Peak Demand and annual Net Energy for Load.
  - 1.5.4.** How the controllable and dispatchable Demand Side Management forecast compares to actual controllable and dispatchable Demand Side Management for the prior calendar year and, if applicable, how the assumptions and methods for future forecasts were adjusted.
  - 1.5.5.** How the peak Demand forecast compares to actual Demand for the prior calendar year with due regard to any relevant weather-related variations (e.g., temperature, humidity, or wind speed) and, if applicable, how the assumptions and methods for future forecasts were adjusted.
- M1.** The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.
- R2.** Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- M2.** Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal letters that it provided the requested data in accordance with Requirement R2.
- R3.** The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties. *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*
- M3.** Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.

**Rationale for R4:** This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

The obligation to share data under Requirement R4 does not supersede or otherwise modify any of the Applicable Entity's existing confidentiality obligations. For instance, if an entity is prohibited from providing any of the requested data pursuant to confidentiality provisions of an Open Access Transmission Tariff or a contractual arrangement, Requirement R4 does not require the Applicable Entity to provide the data to a requesting entity. Rather, under Part 4.1, the Applicable Entity must simply provide written notification to the requesting entity that it will not be providing the data and the basis for not providing the data. If the Applicable Entity is subject to confidentiality obligations that allow the Applicable Entity to share the data only if certain conditions are met, the Applicable Entity shall ensure that those conditions are met within the 45-day time period provided in Requirement R4, communicate with the requesting entity regarding an extension of the 45-day time period so as to meet all those conditions, or provide justification under Part 4.1 as to why those conditions cannot be met under the circumstances.

- R4.** Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or

otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1. Unless otherwise agreed upon, the Applicable Entity: *[Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]*

- shall not be required to alter the format in which it maintains or uses the data;
- ~~shall~~ shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; ~~and~~ unless providing
- ~~shall not be required to provide any~~ the requested data ~~that, if provided,~~ would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements; ~~and~~
- ~~shall not be required to alter the format in which it maintains or uses the data.~~

**4.1.** If the Applicable Entity does not provide data requested because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a written response to the requesting entity specifying the data that is not being provided and on what basis.

**M4.** Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

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The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audit

Self-Certification

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Self-Reporting

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#### 1.4. Additional Compliance Information

None

Table of Compliance Elements

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			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Long-term Planning	Medium	N/A	N/A	N/A	The Planning Coordinator or Balancing Authority developed and issued a data request but failed to include either the entity(s) necessary to provide the data or the timetable for providing the data.
R2	Long-term Planning	Medium	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide all of the data requested in Requirement R1 part 1.5.1 through part 1.5.5</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide one of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide two of the requested items in Requirement R1 part</p>	<p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.3.1 through part 1.3.4</p> <p>OR</p> <p>The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide three or more of the requested items in Requirement R1 part 1.4.1 through part 1.4.5</p>



			<p>did so after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 6 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>1.4.1 through part 1.4.5 OR The Applicable Entity, as defined in the data request developed in Requirement R1, provided the data requested in Requirement R1, but did so 11 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2 but prior to 15 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>	<p>OR The Applicable Entity, as defined in the data request developed in Requirement R1, failed to provide the data requested in the timetable provided pursuant to Requirement R1 prior to 16 days after the date indicated in the timetable provided pursuant to Requirement R1 part 1.2.</p>
R3	Long-term Planning	Medium	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data <del>requested</del><u>collected</u></p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data <del>requested</del><u>collected</u></p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, made available the data <del>requested</del><u>collected</u></p>	<p>The Planning Coordinator or Balancing Authority, in response to a request by the Regional Entity, failed to make available the data <del>requested</del><u>collected under Requirement R2</u> prior to 91</p>

			<del>under Requirement R2</del> , but did so after 75 days from the date of request but prior to 81 days from the date of the request.	<del>under Requirement R2</del> , but did so after 80 days from the date of request but prior to 86 days from the date of the request.	<del>under Requirement R2</del> , but did so after 85 days from the date of request but prior to 91 days from the date of the request.	days or more from the date of the request.
R4	Long-term Planning	Medium	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 45 days from the date of request but prior to 51 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 30 days of the written request but prior to 36 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 50 days from the date of request but prior to 56 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 35 days of the written request but prior to 41 days of the written request.</p>	<p>The Applicable Entity provided or otherwise made available the data to the requesting entity but did so after 55 days from the date of request but prior to 61 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested provided a written response specifying the data that is not being provided and on what basis but did so after 40 days of the written request but prior to 46 days of the written request.</p>	<p>The Applicable Entity failed to provide or otherwise make available the data to the requesting entity within 60 days from the date of the request</p> <p>OR</p> <p>The Applicable Entity that is not providing the data requested failed to provide a written response specifying the data that is not being provided and on what basis within 45 days of the written request.</p>

**MOD-031-2 — Demand and Energy Data**

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**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	May 6, 2014	Adopted by the NERC Board of Trustees.	
1	February 19, 2015	FERC order approving MOD-031-1	

## Application Guidelines

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### Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

#### Rationale for R1:

Rationale for R1: To ensure that when Planning Coordinators (PCs) or Balancing Authorities (BAs) request data (R1), they identify the entities that must provide the data (Applicable Entity in part 1.1), the data to be provided (parts 1.3 – 1.5) and the due dates (part 1.2) for the requested data.

For Requirement R1 part 1.3.2.1, if the Demand does not vary due to weather-related conditions (e.g., temperature, humidity or wind speed), or the weather assumed in the forecast was the same as the actual weather, the weather normalized actual Demand will be the same as the actual demand reported for Requirement R1 part 1.3.2. Otherwise the annual peak hour weather normalized actual Demand will be different from the actual demand reported for Requirement R1 part 1.3.2.

Balancing Authorities are included here to reflect a practice in the WECC Region where BAs are the entity that perform this requirement in lieu of the PC.

#### Rationale for R2:

This requirement will ensure that entities identified in Requirement R1, as responsible for providing data, provide the data in accordance with the details described in the data request developed in accordance with Requirement R1. In no event shall the Applicable Entity be required to provide data under this requirement that is outside the scope of parts 1.3 - 1.5 of Requirement R1.

#### Rationale for R3:

This requirement will ensure that the Planning Coordinator or when applicable, the Balancing Authority, provides the data requested by the Regional Entity.

#### Rationale for R4:

This requirement will ensure that the Applicable Entity will make the data requested by the Planning Coordinator or Balancing Authority in Requirement R1 available to other applicable entities (Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner) unless providing the data would conflict with the provisions outlined in Requirement R4 below. The sharing of documentation of the supporting methods and assumptions used to develop forecasts as well as information-sharing activities will improve the efficiency of planning practices and support the identification of needed system reinforcements.

## Implementation Plan

### Project 2010-04.1 Demand and Energy Data

#### Implementation Plan for MOD-031-2 – Demand and Energy Data

##### ***Approvals Required***

MOD-031-2 – Demand and Energy Data

##### ***Prerequisite Approvals***

There are no other standards that must receive approval prior to the approval of this standard.

##### ***Revisions to Glossary Terms***

N/A

##### ***Applicable Entities***

Planning Coordinator and Planning Authority

Transmission Planner

Resource Planner

Balancing Authority

Load-Serving Entity

Distribution Provider

##### ***Applicable Facilities***

N/A

##### ***Conforming Changes to Other Standards***

None

##### ***Effective Dates***

MOD-031-2 shall become effective as follows:

The later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date that this standard is approved by applicable regulatory authorities or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is

required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of the effective date of MOD-031-1 or the first day of the first calendar quarter that is six months after the date the standard is adopted by the NERC Board of Trustees or as otherwise provided for in that jurisdiction.

***Justification***

The six-month implementation period will provide sufficient time for the applicable entities to develop the necessary process to implement this standard.

***Retirements***

MOD-031-1 shall be retired at 11:59:59 p.m. of the day immediately prior to the effective date of MOD-031-2 in the particular jurisdiction in which the new standard is becoming effective.

## Standards Announcement

Project 2010-04.1 MOD-031 FERC Order No. 804 Directives  
MOD-031-2

**Final Ballot Open through October 15, 2015**

### [Now Available](#)

A final ballot for **MOD-031-2 – Demand and Energy Data** is open through **8 p.m. Eastern, Thursday, October 15, 2015.**

### **Balloting**

In the final ballot, votes are counted by exception. Only members of the ballot pool may cast a vote. All ballot pool members may change their previously cast vote. A ballot pool member who failed to vote during the previous ballot period may vote in the final ballot period. If a ballot pool member does not participate in the final ballot, the member's vote from the previous ballot will be carried over as their vote in the final ballot.

Members of the ballot pool associated with this project may log in and submit their vote for the standard [here](#). If you experience any difficulties using the Standards Balloting & Commenting System (SBS), contact [Wendy Muller](#).

*If you are having difficulty accessing the SBS due to a forgotten password, incorrect credential error messages, or system lock-out, contact NERC IT support directly at [EROhelpdesk@nerc.net](mailto:EROhelpdesk@nerc.net) (Monday – Friday, 8 a.m. - 8 p.m. Eastern).*

### **Next Steps**

The voting results for the standard will be posted and announced after the ballot closes. If approved, the standard will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

### **Standards Development Process**

For more information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Darrel Richardson](#) (via email) or at (609) 613-1848.

North American Electric Reliability Corporation  
3353 Peachtree Rd, NE  
Suite 600, North Tower  
Atlanta, GA 30326  
404-446-2560 | [www.nerc.com](http://www.nerc.com)



## Standards Announcement

Project 2010-04.1 MOD-031 FERC Order No. 804 Directives  
MOD-031-2

### Final Ballot Results

#### [Now Available](#)

A final ballot for **MOD-031-2 – Demand and Energy Data** concluded **8 p.m. Eastern, Thursday, October 15, 2015**.

The standard received sufficient affirmative votes for approval. Voting statistics are listed below, and the [Ballot Results](#) page provides detailed results for the ballot.

Ballot
Quorum / Approval
89.60% / 90.01%

### Next Steps

The standard will be submitted to the Board of Trustees for adoption and then filed with the appropriate regulatory authorities.

### Standards Development Process

For more information on the Standards Development Process, refer to the [Standard Processes Manual](#).

For more information or assistance, contact Senior Standards Developer, [Darrel Richardson](#) (via email) or at (609) 613-1848.

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404-446-2560 | [www.nerc.com](http://www.nerc.com)

# NERC Balloting Tool (/)

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## BALLOT RESULTS

**Ballot Name:** 2010-04.1 MOD-031 FERC Order No. 804 Directives MOD-031-2 FN 2 ST

**Voting Start Date:** 10/6/2015 12:17:53 PM

**Voting End Date:** 10/15/2015 8:00:00 PM

**Ballot Type:** ST

**Ballot Activity:** FN

**Ballot Series:** 2

**Total # Votes:** 267

**Total Ballot Pool:** 298

**Quorum:** 89.6

**Weighted Segment Value:** 90.01

Segment	Ballot Pool	Segment Weight	Affirmative Votes	Affirmative Fraction	Negative Votes w/ Comment	Negative Fraction w/ Comment	Negative Votes w/o Comment	Abstain	No Vote
Segment: 1	76	1	58	0.935	4	0.065	0	7	7
Segment: 2	9	0.9	8	0.8	1	0.1	0	0	0
Segment: 3	68	1	52	0.897	6	0.103	0	3	7
Segment: 4	26	1	16	0.762	5	0.238	0	1	4
Segment: 5	67	1	52	0.963	2	0.037	0	3	10
Segment: 6	41	1	34	0.944	2	0.056	0	2	3
Segment: 7	0	0	0	0	0	0	0	0	0
Segment: 8	1	0.1	1	0.1	0	0	0	0	0
Segment: 9	2	0.2	1	0.1	1	0.1	0	0	0

Segment: 10	8	0.8	8	0.8	0	0	0	0	0
Totals:	298	7	230	6.301	21	0.699	0	16	31

## BALLOT POOL MEMBERS

Show  entries

Search:

Segment	Organization	Voter	Designated Proxy	Ballot	NERC Memo
1	Ameren - Ameren Services	Eric Scott		None	N/A
1	American Transmission Company, LLC	Andrew Pusztai		Abstain	N/A
1	APS - Arizona Public Service Co.	Michelle Amarantos		Affirmative	N/A
1	Associated Electric Cooperative, Inc.	Phil Hart		Affirmative	N/A
1	Avista - Avista Corporation	Bryan Cox	Rich Hydzik	Affirmative	N/A
1	Balancing Authority of Northern California	Kevin Smith	Joe Tarantino	Affirmative	N/A
1	BC Hydro and Power Authority	Patricia Robertson		Affirmative	N/A
1	Beaches Energy Services	Don Cuevas		Negative	N/A
1	Berkshire Hathaway Energy - MidAmerican Energy Co.	Terry Harbour		Affirmative	N/A
1	Black Hills Corporation	Wes Wingen		Abstain	N/A

1	Bonneville Power Administration	Donald Watkins		Affirmative	N/A
1	Brazos Electric Power Cooperative, Inc.	Tony Kroskey		None	N/A
1	Bryan Texas Utilities	John Fontenot		Affirmative	N/A
1	CenterPoint Energy Houston Electric, LLC	John Brockhan		Affirmative	N/A
1	Central Electric Power Cooperative (Missouri)	Michael Bax		None	N/A
1	Cleco Corporation	John Lindsey	Louis Guidry	Affirmative	N/A
1	Con Ed - Consolidated Edison Co. of New York	Chris de Graffenried		Affirmative	N/A
1	Dairyland Power Cooperative	Robert Roddy		Affirmative	N/A
1	Dominion - Dominion Virginia Power	Larry Nash		Affirmative	N/A
1	Duke Energy	Doug Hils		Affirmative	N/A
1	Edison International - Southern California Edison Company	Steven Mavis		Affirmative	N/A
1	Entergy - Entergy Services, Inc.	Oliver Burke		Affirmative	N/A
1	Exelon	Chris Scanlon		Affirmative	N/A
1	FirstEnergy - FirstEnergy Corporation	William Smith		Affirmative	N/A
1	Georgia Transmission Corporation	Jason Snodgrass		Affirmative	N/A
1	Great Plains Energy - Kansas City Power and Light Co.	James McBee	Douglas Webb	Affirmative	N/A
1	Great River Energy	Gordon Pietsch		Affirmative	N/A
1	Hoosier Energy Rural Electric Cooperative, Inc.	Bob Solomon		None	N/A

1	Hydro One Networks, Inc.	Payam Farahbakhsh		Abstain	N/A
1	Hydro-Québec TransEnergie	Martin Boisvert		Affirmative	N/A
1	IDACORP - Idaho Power Company	Laura Nelson		Affirmative	N/A
1	International Transmission Company Holdings Corporation	Michael Moltane	Meghan Ferguson	Abstain	N/A
1	KAMO Electric Cooperative	Walter Kenyon		Affirmative	N/A
1	Los Angeles Department of Water and Power	faranak sarbaz		Affirmative	N/A
1	Lower Colorado River Authority	Teresa Cantwell		Abstain	N/A
1	M and A Electric Power Cooperative	William Price		Affirmative	N/A
1	Manitoba Hydro	Mike Smith		Affirmative	N/A
1	MEAG Power	David Weekley	Scott Miller	Affirmative	N/A
1	Muscatine Power and Water	Andy Kurriger		Affirmative	N/A
1	National Grid USA	Michael Jones		Affirmative	N/A
1	NB Power Corporation	Alan MacNaughton		Affirmative	N/A
1	Nebraska Public Power District	Jamison Cawley		Affirmative	N/A
1	New York Power Authority	Salvatore Spagnolo		None	N/A
1	NextEra Energy - Florida Power and Light Co.	Mike O'Neil		Affirmative	N/A
1	NiSource - Northern Indiana Public Service Co.	Charles Raney		Affirmative	N/A
1	Northeast Missouri Electric Power	Kevin White		Affirmative	N/A

	Cooperative				
1	NorthWestern Energy	Belinda Tierney		None	N/A
1	OGE Energy - Oklahoma Gas and Electric Co.	Terri Pyle		Negative	N/A
1	Oncor Electric Delivery	Rod Kinard	Gul Khan	Affirmative	N/A
1	OTP - Otter Tail Power Company	Charles Wicklund		Affirmative	N/A
1	Peak Reliability	Jared Shakespeare		Abstain	N/A
1	PHI - Potomac Electric Power Co.	David Thorne		Affirmative	N/A
1	Platte River Power Authority	John Collins		Affirmative	N/A
1	PNM Resources - Public Service Company of New Mexico	Laurie Williams		Affirmative	N/A
1	PPL Electric Utilities Corporation	Brenda Truhe		Abstain	N/A
1	PSEG - Public Service Electric and Gas Co.	Joseph Smith		Affirmative	N/A
1	Public Utility District No. 1 of Snohomish County	Long Duong		Affirmative	N/A
1	Public Utility District No. 2 of Grant County, Washington	Michiko Sell		Negative	N/A
1	Sacramento Municipal Utility District	Tim Kelley	Joe Tarantino	Affirmative	N/A
1	Salt River Project	Steven Cobb		Affirmative	N/A
1	Santee Cooper	Shawn Abrams		Affirmative	N/A
1	SCANA - South Carolina Electric and Gas Co.	Tom Hanzlik		Affirmative	N/A
1	Seattle City Light	Pawel Krupa		Affirmative	N/A
1	Seminole Electric Cooperative, Inc.	Mark Churilla	Bret Galbraith	Affirmative	N/A

1	Sho-Me Power Electric Cooperative	Denise Stevens		Affirmative	N/A
1	Southern Company - Southern Company Services, Inc.	Robert A. Schaffeld		Affirmative	N/A
1	Southwest Transmission Cooperative, Inc.	John Shaver		Negative	N/A
1	Tacoma Public Utilities (Tacoma, WA)	John Merrell		Affirmative	N/A
1	Tallahassee Electric (City of Tallahassee, FL)	Scott Langston		Affirmative	N/A
1	Tennessee Valley Authority	Howell Scott		Affirmative	N/A
1	Tri-State G and T Association, Inc.	Tracy Sliman		Affirmative	N/A
1	Unisource - Tucson Electric Power Co.	John Tolo		Affirmative	N/A
1	United Illuminating Co.	Jonathan Appelbaum		Affirmative	N/A
1	Westar Energy	Kevin Giles		Affirmative	N/A
1	Western Area Power Administration	Steve Johnson		None	N/A
1	Xcel Energy, Inc.	Dean Schiro		Affirmative	N/A
2	BC Hydro and Power Authority	Venkataramakrishnan Vinnakota		Affirmative	N/A
2	California ISO	Richard Vine		Affirmative	N/A
2	Electric Reliability Council of Texas, Inc.	Elizabeth Axson		Negative	N/A
2	Herb Schrayshuen	Herb Schrayshuen		Affirmative	N/A
2	Independent Electricity System Operator	Leonard Kula		Affirmative	N/A
2	ISO New England, Inc.	Michael Puscas	John Pearson	Affirmative	N/A
2	Midcontinent ISO, Inc.	Terry Bilke		Affirmative	N/A
2	New York	Gregory Campoli		Affirmative	N/A

	Independent System Operator				
2	PJM Interconnection, L.L.C.	Mark Holman		Affirmative	N/A
3	Ameren - Ameren Services	David Jendras		None	N/A
3	Anaheim Public Utilities Dept.	Dennis Schmidt		Affirmative	N/A
3	APS - Arizona Public Service Co.	Jeri Freimuth		Affirmative	N/A
3	Associated Electric Cooperative, Inc.	Todd Bennett		Affirmative	N/A
3	Austin Energy	Lisa Martin		Affirmative	N/A
3	Avista - Avista Corporation	Scott Kinney		Affirmative	N/A
3	Basin Electric Power Cooperative	Jeremy Voll		Affirmative	N/A
3	BC Hydro and Power Authority	Pat Harrington		Affirmative	N/A
3	Beaches Energy Services	Steven Lancaster		Negative	N/A
3	Berkshire Hathaway Energy - MidAmerican Energy Co.	Thomas Mielnik	Darnez Gresham	Affirmative	N/A
3	Bonneville Power Administration	Rebecca Berdahl		Affirmative	N/A
3	Central Electric Power Cooperative (Missouri)	Adam Weber		Affirmative	N/A
3	City of Green Cove Springs	Mark Schultz		Negative	N/A
3	City of Leesburg	Chris Adkins		Negative	N/A
3	Clark Public Utilities	Jack Stamper		Affirmative	N/A
3	CMS Energy - Consumers Energy Company	Karl Blaszkowski		Affirmative	N/A
3	Colorado Springs	Charles Morgan		Affirmative	N/A



	Utilities				
3	Con Ed - Consolidated Edison Co. of New York	Peter Yost		Affirmative	N/A
3	Dominion - Dominion Resources, Inc.	Connie Lowe		Affirmative	N/A
3	DTE Energy - Detroit Edison Company	Kent Kujala		Affirmative	N/A
3	Duke Energy	Lee Schuster		Affirmative	N/A
3	Edison International - Southern California Edison Company	Romel Aquino		Affirmative	N/A
3	Exelon	John Bee		Affirmative	N/A
3	FirstEnergy - FirstEnergy Corporation	Theresa Ciancio		Affirmative	N/A
3	Florida Municipal Power Agency	Joe McKinney		Negative	N/A
3	Georgia System Operations Corporation	Scott McGough		Affirmative	N/A
3	Grand River Dam Authority	Jeff Wells		Abstain	N/A
3	Great Plains Energy - Kansas City Power and Light Co.	Jessica Tucker	Douglas Webb	Affirmative	N/A
3	Great River Energy	Brian Glover		Affirmative	N/A
3	Hydro One Networks, Inc.	Paul Malozewski	Oshani Pathirane	Abstain	N/A
3	JEA	Garry Baker		None	N/A
3	KAMO Electric Cooperative	Ted Hilmes		Affirmative	N/A
3	Lakeland Electric	David Hadzima		Negative	N/A
3	Lincoln Electric System	Jason Fortik		Affirmative	N/A
3	Los Angeles Department of Water	Mike Ancil		Affirmative	N/A

	and Power				
3	M and A Electric Power Cooperative	Stephen Pogue		Affirmative	N/A
3	Manitoba Hydro	Karim Abdel-Hadi		Affirmative	N/A
3	MEAG Power	Roger Brand	Scott Miller	Affirmative	N/A
3	Muscatine Power and Water	Seth Shoemaker		Affirmative	N/A
3	National Grid USA	Brian Shanahan		Affirmative	N/A
3	Nebraska Public Power District	Tony Eddleman		Affirmative	N/A
3	New York Power Authority	David Rivera		Affirmative	N/A
3	NiSource - Northern Indiana Public Service Co.	Ramon Barany		Affirmative	N/A
3	Northeast Missouri Electric Power Cooperative	Skyler Wiegmann		Affirmative	N/A
3	OGE Energy - Oklahoma Gas and Electric Co.	Donald Hargrove		Negative	N/A
3	PHI - Potomac Electric Power Co.	Mark Yerger		Affirmative	N/A
3	PNM Resources	Michael Mertz		None	N/A
3	PPL - Louisville Gas and Electric Co.	Charles Freibert		Abstain	N/A
3	PSEG - Public Service Electric and Gas Co.	Jeffrey Mueller		Affirmative	N/A
3	Public Utility District No. 1 of Okanogan County	Dale Dunckel		None	N/A
3	Puget Sound Energy, Inc.	Andrea Basinski		None	N/A
3	Sacramento Municipal Utility District	Rachel Moore	Joe Tarantino	Affirmative	N/A
3	Salt River Project	John Coggins		Affirmative	N/A

3	Santee Cooper	James Poston		Affirmative	N/A
3	SCANA - South Carolina Electric and Gas Co.	Clay Young		None	N/A
3	Seattle City Light	Dana Wheelock		Affirmative	N/A
3	Seminole Electric Cooperative, Inc.	James Frauen		Affirmative	N/A
3	Sho-Me Power Electric Cooperative	Jeff Neas		Affirmative	N/A
3	Snohomish County PUD No. 1	Mark Oens		Affirmative	N/A
3	Southern Company - Alabama Power Company	R. Scott Moore		Affirmative	N/A
3	Tacoma Public Utilities (Tacoma, WA)	Marc Donaldson		Affirmative	N/A
3	Tallahassee Electric (City of Tallahassee, FL)	John Williams		Affirmative	N/A
3	TECO - Tampa Electric Co.	Ronald Donahey		None	N/A
3	Tennessee Valley Authority	Ian Grant		Affirmative	N/A
3	Tri-State G and T Association, Inc.	Janelle Marriott Gill		Affirmative	N/A
3	WEC Energy Group, Inc.	James Keller		Affirmative	N/A
3	Westar Energy	Bo Jones		Affirmative	N/A
3	Xcel Energy, Inc.	Michael Ibold		Affirmative	N/A
4	Alliant Energy Corporation Services, Inc.	Kenneth Goldsmith		Affirmative	N/A
4	Austin Energy	Tina Garvey		Affirmative	N/A
4	Blue Ridge Power Agency	Duane Dahlquist		None	N/A
4	City of Clewiston	Lynne Mila		Negative	N/A

4	City of New Smyrna Beach Utilities Commission	Tim Beyrle		Negative	N/A
4	City of Redding	Nick Zettel	Bill Hughes	Affirmative	N/A
4	CMS Energy - Consumers Energy Company	Julie Hegedus		None	N/A
4	DTE Energy - Detroit Edison Company	Daniel Herring		Affirmative	N/A
4	FirstEnergy - Ohio Edison Company	Doug Hohlbaugh		Affirmative	N/A
4	Florida Municipal Power Agency	Carol Chinn		Negative	N/A
4	Georgia System Operations Corporation	Guy Andrews		Affirmative	N/A
4	Illinois Municipal Electric Agency	Bob Thomas		Affirmative	N/A
4	Keys Energy Services	Stanley Rzas		Negative	N/A
4	MGE Energy - Madison Gas and Electric Co.	Joseph DePoorter		Affirmative	N/A
4	Modesto Irrigation District	Spencer Tacke		None	N/A
4	Municipal Energy Agency of Nebraska	Robin Spady		Abstain	N/A
4	Oklahoma Municipal Power Authority	Ashley Stringer		Affirmative	N/A
4	Public Utility District No. 1 of Snohomish County	John Martinsen		Affirmative	N/A
4	Public Utility District No. 2 of Grant County, Washington	Yvonne McMackin		Negative	N/A
4	Sacramento Municipal Utility District	Michael Ramirez	Joe Tarantino	Affirmative	N/A
4	Seattle City Light	Hao Li		Affirmative	N/A

4	Seminole Electric Cooperative, Inc.	Michael Ward		Affirmative	N/A
4	South Mississippi Electric Power Association	Steve McElhaney		None	N/A
4	Tacoma Public Utilities (Tacoma, WA)	Hien Ho		Affirmative	N/A
4	Utility Services, Inc.	Brian Evans-Mongeon		Affirmative	N/A
4	WEC Energy Group, Inc.	Anthony Jankowski		Affirmative	N/A
5	AEP	Thomas Foltz		Affirmative	N/A
5	Ameren - Ameren Missouri	Sam Dwyer		None	N/A
5	APS - Arizona Public Service Co.	Stephanie Little		Affirmative	N/A
5	Austin Energy	Jeanie Doty		Affirmative	N/A
5	Avista - Avista Corporation	Steve Wenke		None	N/A
5	Basin Electric Power Cooperative	Mike Kraft		None	N/A
5	BC Hydro and Power Authority	Clement Ma		Affirmative	N/A
5	Boise-Kuna Irrigation District - Lucky Peak Power Plant Project	Mike Kukla		Affirmative	N/A
5	Bonneville Power Administration	Francis Halpin		Affirmative	N/A
5	Brazos Electric Power Cooperative, Inc.	Shari Heino		Affirmative	N/A
5	Calpine Corporation	Hamid Zakery		Affirmative	N/A
5	Choctaw Generation Limited Partnership, LLLP	Rob Watson		Affirmative	N/A
5	City and County of San Francisco	Daniel Mason		Affirmative	N/A
5	City of Independence, Power and Light	Jim Nail		Affirmative	N/A

	Department				
5	City of Redding	Paul Cummings	Bill Hughes	Affirmative	N/A
5	Cleco Corporation	Stephanie Huffman	Louis Guidry	Affirmative	N/A
5	CMS Energy - Consumers Energy Company	David Greyerbiehl		Affirmative	N/A
5	Con Ed - Consolidated Edison Co. of New York	Brian O'Boyle		Affirmative	N/A
5	Dairyland Power Cooperative	Tommy Drea		Affirmative	N/A
5	Dominion - Dominion Resources, Inc.	Randi Heise		Affirmative	N/A
5	DTE Energy - Detroit Edison Company	Jeffrey DePriest		Affirmative	N/A
5	Duke Energy	Dale Goodwine		Affirmative	N/A
5	Edison International - Southern California Edison Company	Michael McSpadden		Affirmative	N/A
5	Entergy - Entergy Services, Inc.	Tracey Stubbs		Affirmative	N/A
5	Exelon	Vince Catania		Affirmative	N/A
5	FirstEnergy - FirstEnergy Solutions	Robert Loy		None	N/A
5	Florida Municipal Power Agency	David Schumann		Negative	N/A
5	Great Plains Energy - Kansas City Power and Light Co.	Harold Wyble	Douglas Webb	Affirmative	N/A
5	Great River Energy	Preston Walsh		Affirmative	N/A
5	Hydro-Quebec Production	Roger Dufresne		Affirmative	N/A
5	JEA	John Babik		Affirmative	N/A
5	Lakeland Electric	Jim Howard		None	N/A
5	Lincoln Electric	Kayleigh Wilkerson		Affirmative	N/A

	System				
5	Los Angeles Department of Water and Power	Kenneth Silver		Affirmative	N/A
5	Lower Colorado River Authority	Dixie Wells		Abstain	N/A
5	Luminant - Luminant Generation Company LLC	Rick Terrill		None	N/A
5	Manitoba Hydro	Yuguang Xiao		Affirmative	N/A
5	Massachusetts Municipal Wholesale Electric Company	David Gordon		Abstain	N/A
5	MEAG Power	Steven Grego	Scott Miller	Affirmative	N/A
5	Muscatine Power and Water	Mike Avesing		Affirmative	N/A
5	NB Power Corporation	Rob Vance		Affirmative	N/A
5	Nebraska Public Power District	Don Schmit		Affirmative	N/A
5	New York Power Authority	Wayne Sipperly		Affirmative	N/A
5	NextEra Energy	Allen Schriver		Affirmative	N/A
5	NiSource - Northern Indiana Public Service Co.	Michael Melvin		Affirmative	N/A
5	OGE Energy - Oklahoma Gas and Electric Co.	Leo Staples		Negative	N/A
5	Oglethorpe Power Corporation	Bernard Johnson		Affirmative	N/A
5	Omaha Public Power District	Mahmood Safi		Affirmative	N/A
5	OTP - Otter Tail Power Company	Cathy Fogale		Affirmative	N/A
5	Pacific Gas and Electric Company	Alex Chua		None	N/A

5	Platte River Power Authority	Tyson Archie		Affirmative	N/A
5	PPL Electric Utilities Corporation	Dan Wilson		Abstain	N/A
5	PSEG - PSEG Fossil LLC	Tim Kucey		Affirmative	N/A
5	Public Utility District No. 1 of Snohomish County	Sam Nietfeld		Affirmative	N/A
5	Public Utility District No. 2 of Grant County, Washington	Alex Ybarra		Affirmative	N/A
5	Puget Sound Energy, Inc.	Lynda Kupfer		None	N/A
5	Sacramento Municipal Utility District	Susan Gill-Zobitz	Joe Tarantino	Affirmative	N/A
5	Salt River Project	Kevin Nielsen		Affirmative	N/A
5	SCANA - South Carolina Electric and Gas Co.	Edward Magic		None	N/A
5	Seattle City Light	Mike Haynes		Affirmative	N/A
5	Southern Company - Southern Company Generation	William D. Shultz		Affirmative	N/A
5	Tacoma Public Utilities (Tacoma, WA)	Chris Mattson		None	N/A
5	Tallahassee Electric (City of Tallahassee, FL)	Karen Webb		Affirmative	N/A
5	Tennessee Valley Authority	Brandy Spraker		Affirmative	N/A
5	WEC Energy Group, Inc.	Linda Horn		Affirmative	N/A
5	Westar Energy	stephanie johnson		Affirmative	N/A
5	Xcel Energy, Inc.	David Lemmons		Affirmative	N/A
6	Ameren - Ameren Services	Robert Quinlivan		None	N/A



6	APS - Arizona Public Service Co.	Bobbi Welch		Affirmative	N/A
6	Associated Electric Cooperative, Inc.	Brian Ackermann		Affirmative	N/A
6	Austin Energy	Andrew Gallo		Affirmative	N/A
6	Berkshire Hathaway - PacifiCorp	Sandra Shaffer		Affirmative	N/A
6	Bonneville Power Administration	Alex Spain		Affirmative	N/A
6	City of Redding	Marvin Briggs	Bill Hughes	Affirmative	N/A
6	Cleco Corporation	Robert Hirschak	Louis Guidry	Affirmative	N/A
6	Colorado Springs Utilities	Shannon Fair		Affirmative	N/A
6	Con Ed - Consolidated Edison Co. of New York	Robert Winston		Affirmative	N/A
6	Dominion - Dominion Resources, Inc.	Louis Slade		Affirmative	N/A
6	Duke Energy	Greg Cecil		Affirmative	N/A
6	Exelon	Dave Carlson		Affirmative	N/A
6	FirstEnergy - FirstEnergy Solutions	Ann Ivanc	Richard Hoag	Affirmative	N/A
6	Florida Municipal Power Agency	Richard Montgomery		Negative	N/A
6	Florida Municipal Power Pool	Tom Reedy		Negative	N/A
6	Great Plains Energy - Kansas City Power and Light Co.	Chris Bridges	Douglas Webb	Affirmative	N/A
6	Great River Energy	Donna Stephenson	Michael Brytowski	Affirmative	N/A
6	Lower Colorado River Authority	Michael Shaw		Abstain	N/A
6	Manitoba Hydro	Blair Mukanik		Affirmative	N/A
6	Muscatine Power and	Ryan Streck		Affirmative	N/A

	Water				
6	New York Power Authority	Shivaz Chopra		Affirmative	N/A
6	NextEra Energy - Florida Power and Light Co.	Silvia Mitchell		Affirmative	N/A
6	NiSource - Northern Indiana Public Service Co.	Joe O'Brien		Affirmative	N/A
6	OGE Energy - Oklahoma Gas and Electric Co.	Jerry Nottnagel		None	N/A
6	Oglethorpe Power Corporation	Donna Johnson		Affirmative	N/A
6	Platte River Power Authority	Carol Ballantine		Affirmative	N/A
6	PPL - Louisville Gas and Electric Co.	OELKER LINN		Abstain	N/A
6	Sacramento Municipal Utility District	Diane Clark	Joe Tarantino	Affirmative	N/A
6	Salt River Project	William Abraham	Chris Janick	Affirmative	N/A
6	Santee Cooper	Michael Brown		Affirmative	N/A
6	Seattle City Light	Charles Freeman		Affirmative	N/A
6	Seminole Electric Cooperative, Inc.	Trudy Novak		Affirmative	N/A
6	Snohomish County PUD No. 1	Kenn Backholm		Affirmative	N/A
6	Southern Company - Southern Company Generation and Energy Marketing	John J. Ciza		Affirmative	N/A
6	Tacoma Public Utilities (Tacoma, WA)	Rick Applegate		Affirmative	N/A
6	Talen Energy Marketing, LLC	Elizabeth Davis		Affirmative	N/A
6	Tennessee Valley Authority	Marjorie Parsons		Affirmative	N/A

6	WEC Energy Group, Inc.	David Hathaway		None	N/A
6	Westar Energy	Megan Wagner		Affirmative	N/A
6	Xcel Energy, Inc.	Peter Colussy		Affirmative	N/A
8	David Kiguel	David Kiguel		Affirmative	N/A
9	City of Vero Beach	Ginny Beigel		Negative	N/A
9	Commonwealth of Massachusetts Department of Public Utilities	Donald Nelson		Affirmative	N/A
10	Florida Reliability Coordinating Council	Peter Heidrich		Affirmative	N/A
10	Midwest Reliability Organization	Russel Mountjoy		Affirmative	N/A
10	Northeast Power Coordinating Council	Guy V. Zito		Affirmative	N/A
10	ReliabilityFirst	Anthony Jablonski		Affirmative	N/A
10	SERC Reliability Corporation	David Greene		Affirmative	N/A
10	Southwest Power Pool Regional Entity	Bob Reynolds		Affirmative	N/A
10	Texas Reliability Entity, Inc.	Rachel Coyne		Affirmative	N/A
10	Western Electricity Coordinating Council	Steven Rueckert		Affirmative	N/A

**Exhibit E**

**Standards Drafting Team Roster**

## Project 2010-04.1 Standards Drafting Team MOD-031-2

	Name	Company	Contact
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2	Paul Kure	ReliabilityFirst Corporation (RFC)	paul.kure@rfirst.org
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5	Barbara Doland	SERC Reliability Corporation, Inc.	BDoland@serc1.org
6	Andrey Oks	Northeast Power Coordinating Council, Inc. (NPCC)	aoks@npcc.org
6	Shamai Elstein	NERC	shamai.elstein@nerc.net
6	Darrel Richardson	NERC	darrel.richardson@nerc.net