Consideration of Comments on Initial Ballot — MOD-008-1 — Transmission Reliability Margin Calculation Methodology

Summary Consideration: While some stakeholders suggested modifications to the standard, most stakeholders agreed with the standard as proposed and the drafting team did not make any changes to the standard.

Entity	Segment	Vote	Comment
Ameren Services Company	1	Negative	Ameren would like to thank the SDT for the considerable effort invested in drafting this standard. However, Ameren cannot support this version of MOD-008-1. (1) Applicability: The Transmission Service Provider not the Transmission Operator should be responsible for TRM methodology. This is especially true when the Transmission Service Provider determines TRM for the transmission systems of several Transmission Operators as would occur in an RTO/ISO such as the MISO. (2) Is TRM a reliability parameter or a market parameter? While the concepts of uncertainty and sensitivity analysis are inherent in reliability planning TRM as a metric has not been previously defined in the planning process. TRM has been applied in sale of open access transmission system to limit exposure to oversubscription of transmission service. As such TRM should be the responsibility of the Transmission Service Provider. (3) That said we are aware that the oversubscription of transmission service can lead to reliability problems. (4) The Transmission Service Provider, Transmission Operator, Planning Coordinator, and Transmission Planner should coordinate and cooperate in developing the TRM methodology. (5)TRM is applicable in the Operating Time Horizon and the one-year and beyond horizon.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structure; however, we are required to pick a single entity as responsible for this task. The SDT believes TRM is a reliability parameter, as the Transmission Operator may expect it to be available as one of its tools to manage the reliability of the system and respond to situations outside expected conditions.			

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The SDT concurs that oversubscription can lead to reliability problems. Developing requirements that require collaboration are difficult, as it can be challenging to discover who is not complying. For example, if MISO and Ameren were unable to come to agreement on development of a TRM methodology, should both entities be sanctioned for not meeting the TRM requirements? NERC has attempted to address this through allowing the use of Joint Registration Organizations, where a MISO/Ameren collaboration would be sanctioned as a single entity, and then the JRO would be responsible for determining how to allocate those sanctions among participants in the JRO. With regard to the Time Horizons used in compliance (which are generally used to indicate how much time is available for mitigating a violation to the requirements), the SDT believes the correct horizon is Operations Planning.			
American Electric Power	1	Affirmative	AEP votes affirmative, but we have a concern that the standard appears to have an internal ambiguity. The applicability states “Transmission Operators that maintain TRM" however, R1 requires that “Each Transmission Operator shall prepare and keep current a TRM Implementation Document (TRMID) ...." In the context of R1, it unclear what requirements are placed upon Transmission Operators that DOES NOT maintain TRM. In addition, the Purpose statement implies that TRM is used as a real-time operation value. It is not. Despite these reservations, the proposed standard is benign, and AEP does vote affirmative.
Response: The entire standard only applies to those Transmission Operators that maintain TRM and because this is specified in the applicability, the standard did not reiterate this in the requirements. With regard to the use of TRM as a real-time operation value, the SDT believes that while the TRM may not be explicitly scheduled, the capacity withheld as a margin may be used in real-time (e.g., if load forecast is higher than expected, then some of the margin may be used to support the additional internal generation needed to serve that load).			
Brazos Electric Power Cooperative, Inc.	1	Negative	A NEGATIVE vote is cast for this standard as written as it imposes obligations on entities in the ERCOT region that do not utilize ATC paths and calculation methodologies to manage congestion or for reliability operations. Our previous submitted comments suggested that applicability language be included in the requirements to recognize that such market difference exists.
Response: If ERCOT does not utilize TRM, then this standard does not apply.			
Exelon Energy	1	Affirmative	General comment These standards bring the industry closer to a unified ATC calculation methodology by requiring that one of three calculation methodologies be utilized and documented. This is an improvement from where the industry is today but falls short of FERC Order No. 890. The standards still lack a requirement for ATC or AFC calculations to be consistent with criteria used in operating and planning studies for corresponding time periods. Exelon's comments reflect these deficiencies and Exelon will be making these same points to FERC if these standards are approved, requesting that the FERC direct NERC to approve the standards but modify the standards to be consistent with Order No. 890. Suggested modifications to the standards to achieve this consistency are included in our comments. MOD-008-1 TRM Calculation Methodology Standard lacks a requirement that

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			components of TRM be consistent with those used in operating and planning studies for the same time period being studied
Response: The SDT considered adding the requirement described in previous discussions. However, to do so would negate the value of TRM, as TRM is specifically intended to be based on situations other than those expected. For example, the system might be expected to operate with a load of 10,000 MW. TRM is intended to be used to create a margin such that if load is 11,000 MW, transmission capacity is available to support the serving of that load. In this example, the operations studies performed might include an 11,000 MW case, but would not necessarily include an explicit TRM. The SDT does not believe this to be inconsistent with the intent of Order 890.			
FirstEnergy Energy Delivery	1	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed MOD-008 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and its member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-008 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and Attachment C of the MISO Open Access Transmission and Energy Market Tariff. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. As described in the procedure, "Variances should be identified and considered when a SAR is posted for comment. Variances should also be considered in the drafting of a standard, with the intent to make any necessary variances a part of the initial development of a standard. The public posting allows for all impacted parties to identify the requirements of a NERC reliability standard that might require a variance." FE believes it is important to complete and include the MISO variance in conjunction with the drafting of the MOD-008 standard. FE requests the variance to cover TOP tasks as described in the following requirements: - All Requirements (R1 through R5) Additional Comments: Applicability Section - The applicability states "Transmission Operators that maintain TRM" and all requirements of the standard are applicable to the TOP in regards to preparing and maintaining a TRM Implementation Document (TRMID), distributing the TRMID to other interested parties, calculating TRM

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			consistent with the TRMID, etc. It is unclear to FE what requirements are placed upon a Transmission Operator that DOES NOT maintain TRM. A TOP who does not maintain TRM could be interpreted one of two ways: 1) For a given TOP footprint TRM is not withheld in calculating ATC 2) TRM is withheld for the TOP footprint, but the TOP does not determine or calculate the TRM value withheld. If the appropriate interpretation is as described in item 1) above, it begs the question if this is a needed reliability standard. If TRM is truly a reliability need, it can not be optional for any TOP service area. If the latter, item 2 and FE's understanding, is the correct interpretation, then FE's position on responsibility remains that that the applicability of this standard should rest with the entity performing the calculation of TRM which in many areas of the country is the TSP organization. Since the SDT has elected to not make a change in this regard we are requesting the aforementioned variance for the MISO RTO area.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. The SDT believes the transfer of responsibility described within the MISO Transmission Owners Agreement would be an effective way to delegate this task to a Transmission Service Provider through the registration of a Joint Registration Organization. To the extent an entity variance is desired, First Energy and/or MISO would need to submit a SAR to request the variance. The commenter is correct that ideally a variance would be considered in the SAR process and throughout the standard development process; however, no one has yet requested a variance through a SAR (or incorporated the request into one of the existing SARs during their development), and at this time the drafting team can not add a variance and still meet the deadline established by NERC and FERC for this revision of the standard. Regarding the applicability of the standard, the entire standard only applies to those Transmission Operators that operate their system with the assumption that some transmission capacity margin has been withheld from commercial use to address the reliability threats listed in R1. The SDT does not believe that TRM is required for all entities; entities that have reviewed the risks listed in R1 and determined that they can manage those risks through other means (e.g., demand **Response**, operating guides, etc...) are not required to maintain TRM.			
Great River Energy	1	Negative	GRE is concerned with the Transmission Operator being the responsible entity for MOD-008. GRE believes that the responsible entity for these requirements should be the Transmission Service Provider. If the Transmission Operator does not perform this function then a delegation agreement must be created between it and the entity performing the function. It is GRE's opinion that a standard should not knowingly be written in a manner that requires delegation agreements for a large number of responsible entities, doing so is an inefficient use of resources.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structures;			

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however, we are required to pick a single entity as responsible for this task.			
Sierra Pacific Power Co.	1	Affirmative	Affirmative vote with comment: The severity levels surrounding R1 still appear to imply that all of the sub-items of R1.1 are expected to be used in the TRMID. It must be clear that it does not constitute a violation if various of these sub-items are not applicable to the TRMID used by the entity. Clarify that this is "as applicable" or "as determined by the entity".
Response: The VSL indicates that entities must comply with R1.1. R1.1 requires the "Identification of... each of the following components of uncertainty *if used in establishing TRM*" (emphasis added). If the entity does not use a specific element in determining TRM, then its absence would not result in a violation.			
Southwest Transmission Cooperative, Inc.	1	Affirmative	SWTC supports all elements of MOD-08; however, the VSLs as redrafted to accommodate the industry comments have blurred the lines of severity and grant additional discretion to the enforcement entity. Further, the Applicable entity should be clarified throughout the standard to clearly identify whether the standard applies only to TOs that maintain TRM or to all TOs.
Response: The SDT reviewed the VSLs and concludes that they appropriately minimize the discretion of the enforcement entity. If in future comments on standards you could be more specific, that would aid the team in addressing your concerns. The entire standard only applies to those Transmission Operators that maintain TRM and because this is specified in the applicability, the standard did not reiterate this in the requirements.			
Tucson Electric Power Co.	1	Affirmative	TEP supports proposed WECC Team remedial language clarifying VSL severity level.
Response: The SDT does not have the WECC team remedial language, and therefore cannot comment on it.			
Ameren Services Company	3	Negative	Ameren would like to thank the SDT for the considerable effort invested in drafting this standard. However, Ameren cannot support this version of MOD-008-1. Applicability: The Transmission Service Provider not the Transmission Operator should be responsible for TRM methodology. This is especially true when the Transmission Service Provider determines TRM for the transmission systems of several Transmission Operators as would occur in an RTO/ISO such as the MISO. Is TRM a reliability parameter or a market parameter? While the concepts of uncertainty and sensitivity analysis are inherent in reliability planning TRM as a metric has not been previously defined in the planning process. TRM has been applied in sale of open access transmission system to limit exposure to oversubscription of transmission service. As such TRM should be the responsibility of the Transmission Service Provider. That said we are aware that the oversubscription of transmission service can lead to reliability problems. The Transmission Service Provider, Transmission Operator, Planning Coordinator, and Transmission Planner should coordinate and cooperate in developing the TRM methodology.

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			TRM is applicable in the Operating Time Horizon and the one-year and beyond horizon
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structure; however, we are required to pick a single entity as responsible for this task. The SDT believes TRM is a reliability parameter, as the Transmission Operator may expect it to be available as one of his or her tools to manage the reliability of the system and respond to situations outside expected conditions. The SDT concurs that oversubscription can lead to reliability problems. Developing requirements that require collaboration are difficult, as it can be challenging to discover who is not complying. For example, if MISO and Ameren were unable to come to agreement on development of a TRM methodology, should both entities be sanctioned for not meeting the TRM requirements? NERC has attempted to address this through allowing the use of Joint Registration Organizations, where a MISO/Ameren collaboration would be sanctioned as a single entity, and then the JRO would be responsible for determining how to allocate those sanctions among participants in the JRO. With regard to the Time Horizons used in compliance (which are generally used to indicate how much time is available for mitigating a violation to the requirements), the SDT believes the correct horizon is Operations Planning.			
City Public Service of San Antonio	3	Negative	I cannot vote for this standard as written. It needs to acknowledge definitive alternatives to ATC for regions or markets such as ERCOT where transmission service markets are not used.
Response: If ERCOT does not utilize TRM, then this standard does not apply.			
Constellation Energy	3	Affirmative	Greater standardization in the determination of TRM and monitoring of the on-going appropriateness of the amount set aside for TRM is required.
Response: The SDT did not believe that it could, at this time, define a single methodology for TRM without arbitrarily affecting either reliability, market access or both. The SDT encourages entities to submit requests for future work to be considered as part of NERC's annual standards planning process.			
FirstEnergy Solutions	3	Affirmative	FirstEnergy Corp. appreciates the hard work of the Standard Drafting Team on the challenging task of reorganizing and enhancing the verbiage of the IROL requirements. We vote AFFIRMATIVE to standard IRO-008-1 and ask that the SDT consider our enclosed comments. Comments on EOP-001, IRO-002, IRO-004, IRO-005, TOP-003, TOP-005, and TOP-006: General "The Violation Risk Factors should be added to the text of all of the standards. IRO-004 - VSL table shows "R7" instead of "R1" IRO-005 - Several Measures reference the incorrect requirement numbers TOP-003 - R4 — There is no measure associated with this requirement - Measures do not include evidence of "planning" of

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			scheduled outages per the requirements - VSL for R3 and R4 are incorrect and reference the wrong entity per the requirements
Response: The SDT does not believe these comments are related to MOD-008.			
Lincoln Electric System	3	Negative	LES is concerned with the Transmission Operator being the responsible entity for MOD-008. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structures; however, we are required to pick a single entity as responsible for this task.			
Wisconsin Public Service Corp.	3	Negative	The Transmission Service Provider should be the responsible entity for MOD-008, not the Transmission Operator.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structures; however, we are required to pick a single entity as responsible for this task.			
Alliant Energy Corp. Services, Inc.	4	Negative	We believe the Transmission Service Provider should be the responsible entity.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structures; however, we are required to pick a single entity as responsible for this task.			
Public Utility District No. 1 of Douglas County	4	Negative	We have not had sufficient time to review the effects of this change and coordinate it with others in our region.
Response: The SDT believes that significant time has been allowed for entities to review and comment on the standard.			
WPS Resources Corp.	4	Negative	Requirement R3. The TRMID document should be made available to all users, owners, and operators. That is, the TRMID should be publicly available.
Response: The North American Energy Standards Board (NAESB) is responsible for developing business practices related to public availability of information to support commercial needs. The SDT believes it is NAESB intention to require the disclosure of the TRMID on the OASIS. The NERC standard is related only to reliability, and there is no reliability need for public posting.			
Constellation Generation Group	5	Negative	Greater standardization in the determination of TRM and monitoring of the on-going appropriateness of the amount set aside for TRM is required then this standard provides.

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			TRM seems to be applied only at certain times by certain TPs. For example, one large TP in the South applies TRM only when an entity is looking for long term transmission service outside an 18 month window. That is, if the transmission service is for a year but the year begins and ends within the next 18 months, TRM isn't applied. This causes a very significant difference in study results. Others apply it differently. This type of item should be standardized.
Response: The SDT did not believe that it could, at this time, define a single methodology for TRM without arbitrarily affecting either reliability, market access or both. The SDT encourages entities to submit requests for future work to be considered as part of NERC's annual planning process. The MOD standards do require that TRM and other factors of TTC/TFC be applied consistently by an entity so that all users of their system are treated equally.			
Electric Power Supply Association	5	Negative	Greater standardization is required with the standard as drafted. Determination of TRM and monitoring of the associated with the ongoing appropriateness of the amounts set aside for TRM is required to achieve the needed standardization.
Response: The SDT did not believe that it could, at this time, define a single methodology for TRM without arbitrarily affecting either reliability, market access or both. The SDT encourages entities to submit requests for future work to be considered as part of NERC's annual planning process.			
FirstEnergy Solutions	5	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed MOD-008 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and its member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-008 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and Attachment C of the MISO Open Access Transmission and Energy Market Tariff. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. As described in the procedure, "Variances should be identified and considered when a SAR is posted for comment. Variances should also be considered in the drafting of a standard, with the intent

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			to make any necessary variances a part of the initial development of a standard. The public posting allows for all impacted parties to identify the requirements of a NERC reliability standard that might require a variance." FE believes it is important to complete and include the MISO variance in conjunction with the drafting of the MOD-008 standard. FE requests the variance to cover TOP tasks as described in the following requirements: - All Requirements (R1 through R5) Additional Comments: Applicability Section - The applicability states "Transmission Operators that maintain TRM" and all requirements of the standard are applicable to the TOP in regards to preparing and maintaining a TRM Implementation Document (TRMID), distributing the TRMID to other interested parties, calculating TRM consistent with the TRMID, etc. It is unclear to FE what requirements are placed upon a Transmission Operator that DOES NOT maintain TRM. A TOP who does not maintain TRM could be interpreted one of two ways: 1) For a given TOP footprint TRM is not withheld in calculating ATC 2) TRM is withheld for the TOP footprint, but the TOP does not determine or calculate the TRM value withheld. If the appropriate interpretation is as described in item 1) above, it begs the question if this is a needed reliability standard. If TRM is truly a reliability need, it can not be optional for any TOP service area. If the latter, item 2 and FE's understanding, is the correct interpretation, then FE's position on responsibility remains that that the applicability of this standard should rest with the entity performing the calculation of TRM which in many areas of the country is the TSP organization. Since the SDT has elected to not make a change in this regard we are requesting the aforementioned variance for the MISO RTO area.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. The SDT believes the transfer of responsibility described within the MISO Transmission Owners Agreement would be an effective way to delegate this task to a Transmission Service Provider through the registration of a Joint Registration Organization. To the extent an entity variance is desired, First Energy and/or MISO would need to submit a SAR to request the variance. The commenter is correct that ideally a variance would be considered in the SAR process and throughout the standard development process; however, no one has yet requested a variance through a SAR (or incorporated the request into one of the existing SARs during their development), and at this time the drafting team can not add a variance and still meet the deadline established by NERC and FERC for this revision of the standard. Regarding the applicability of the standard, the entire standard only applies to those Transmission Operators that operate their system with the assumption that some transmission capacity margin has been withheld from commercial use to address the reliability threats listed in R1. The SDT does not believe that TRM is required for all entities; entities that have reviewed the risks listed in R1 and determined that they can manage those risks through other means (e.g., demand response, operating guides, etc…) are not required to maintain TRM.			
Lincoln Electric System	5	Negative	LES is concerned with the Transmission Operator being the responsible entity for MOD-008. We believe that the responsible entity for these requirements should be the Transmission

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Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structures; however, we are required to pick a single entity as responsible for this task.			
AEP Marketing	6	Affirmative	AEP has a concern because the standard appears to have an internal ambiguity. The applicability states “Transmission Operators that maintain TRM" however, R1 requires that “Each Transmission Operator shall prepare and keep current a TRM Implementation Document (TRMID) ...." In the context of R1, it unclear what requirements are placed upon Transmission Operators that DOES NOT maintain TRM. In addition, the Purpose statement implies that TRM is used as a real-time operation value. It is not.
Response: The entire standard only applies to those Transmission Operators that maintain TRM and because this is specified in the applicability, the standard did not reiterate this in the requirements. With regard to the use of TRM as a real-time operation value, the SDT believes that while the TRM may not be explicitly scheduled, the capacity withheld as a margin may be used in real-time (e.g., if load forecast is higher than expected, then some of the margin may be used to support the additional internal generation needed to serve that load).			
Barry Green Consulting Inc.	6	Negative	Greater standardization in the determination of TRM and monitoring of the on-going appropriateness of the amount set aside for TRM is required.
Response: The SDT did not believe that it could, at this time, define a single methodology for TRM without arbitrarily affecting either reliability, market access or both. The SDT encourages entities to submit requests for future work to be considered as part of NERC’s annual planning process.			
Constellation Energy Commodities Group	6	Negative	Greater standardization in the determination of TRM and monitoring of the ongoing appropriateness of the amount set aside for TRM is required.
Response: The SDT did not believe that it could, at this time, define a single methodology for TRM without arbitrarily affecting either reliability, market access or both. The SDT encourages entities to submit requests for future work to be considered as part of NERC’s annual planning process.			
FirstEnergy Solutions	6	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed MOD-008 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation agreements for a large number of responsible entities. Therefore, in order for FE

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Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. The SDT believes the transfer of responsibility described within the MISO Transmission Owners Agreement would be an effective way to delegate this task to a Transmission Service Provider through the			

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registration of a Joint Registration Organization. To the extent an entity variance is desired, First Energy and/or MISO would need to submit a SAR to request the variance. The commenter is correct that ideally a variance would be considered in the SAR process and throughout the standard development process; however, no one has yet requested a variance through a SAR (or incorporated the request into one of the existing SARs during their development), and at this time the drafting team can not add a variance and still meet the deadline established by NERC and FERC for this revision of the standard. Regarding the applicability of the standard, the entire standard only applies to those Transmission Operators that operate their system with the assumption that some transmission capacity margin has been withheld from commercial use to address the reliability threats listed in R1. The SDT does not believe that TRM is required for all entities; entities that have reviewed the risks listed in R1 and determined that they can manage those risks through other means (e.g., demand response, operating guides, etc…) are not required to maintain TRM.			
Lincoln Electric System	6	Negative	LES is concerned with the Transmission Operator being the responsible entity for MOD-008. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator.			
Volkmann Consulting	8	Negative	This standard does not show the applicability to the Transmission Service Provider. In RTOs the TSP is responsible for calculating and maintaining TRM. Delegation agreements can cover this. However, with the larger portion of the Eastern Interconnection covered by regional tariffs and TSP operation, this standard should speak directly to the TSP responsibilities
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structures; however, we are required to pick a single entity as responsible for this task.			
Electric Reliability Council of Texas, Inc.	10	Abstain	Although the Applicability Section is clear, some Requirements and Measures contain no clear applicability only to those Transmission Operators that maintain TRM in their transmission system and market operations.
Response: The entire standard only applies to those Transmission Operators that maintain TRM and because this is specified in the applicability, the standard did not reiterate this in the requirements.			
Midwest Reliability Organization	10	Negative	The MRO is concerned with the Transmission Operator being the responsible entity for MOD-008. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
Response: The SDT believes the Functional Model indicates that TRM should be established by the Transmission Operator. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. Based on the most recent comment period, the majority of the commenters supported the Transmission Operator as the appropriate entity. The SDT realized this may not be a perfect fit for all structures; however, we are required to pick a single entity as responsible for this task.			