Unofficial Comment Form
Project 2012-05 ATC Revisions (MOD A)
MOD-001-2 (Available Transmission System Capability)

Please DO NOT use this form for submitting comments. Please use the electronic form to submit comments on the Standard. The electronic comment form must be completed by 8:00 p.m. ET Monday, November 18, 2013.

If you have questions please contact Ryan Stewart or by telephone at 404-446-2569.

The project page may be accessed by clicking here.

Background Information
The Project 2012-05 ATC Revisions (MOD A) Standard Drafting Team posted an initial draft of the Standard MOD-001-2 (Available Transmission System Capability) for comment from July 9 to August 27, 2013. The drafting team has revised the standard based on stakeholder comments and suggestions that the drafting team considered appropriate. The following is a summary of changes the drafting team has made:

- Revising Requirement R1 to make the applicability clear that it is for those Transmission Operators (TOPs) that determine Total Flowgate Capability (TFC) or Total Transfer Capability (TTC)
- Revising Requirements R1 and R2 to capture reliability-based requirements in determining Available Flowgate Capability (AFC), Available Transfer Capability (ATC), TFC, or TTC in an entity’s implementation document.
- Revising Requirements R3 and R4 to not force an entity who does not determine Capacity Benefit Margin (CBM) or Transmission Reliability Margin (TRM) to maintain an implementation document to simply state the entity does not determine CBM or TRM.
- Modified all the Measures to expand the examples of evidence.

This posting solicits comments on the revised MOD-001-2 standard. The standard responds to FERC Order 729, as well as recommendations from the Independent Experts Review Panel, usage of the Paragraph 81 criteria in eliminating certain business practice requirements, and lessons learned from compliance history.
Questions on MOD-001-2

1. The drafting team has revised MOD-001-2 in response to stakeholder comments and suggestions. If you do not agree or you agree in general but feel that alternative language would be more appropriate, please provide specific suggestions in your comments.

☐ Yes
☒ No

Comments: The first sentence of the Purpose clearly conveys the purpose of the standard, making the second sentence unneeded. The second sentence also creates confusion with the intent of the standard by having the inconsistent wording “available transmission system transfer capability” and “available transmission system capability” in the Purpose.

We agree with the Independent Experts’ recommendations that the requirement for developing a written methodology (or methodologies) for determining TFC or TTC (as per R1) should be moved to a FAC standard, e.g. FAC-013, if not already adequately covered by a related FAC standard. There is some degree of overlap between R1 of the proposed MOD-001-2 and the FAC standard(s). Having two similar requirements in two standards are unnecessary, and may result in a double jeopardy situation. The SDT should remove, map or combine R1 with like requirements in the appropriate FAC standard.

The last bullet in Measure M1 is written as a requirement, not a measure. This bullet stipulates that the Transmission Operator shall also be using their current method to determine TFC or TTC. R1 requires the development of a methodology for determining TFC or TTC, but does not require the use of the methodology to calculate TFC or TTC. If using the developed methodology to determine TFC or TTC is a requirement, then it should be so stipulated in R1, or in a new R2, but should not be embedded in a measure.

We also agree with the Independent Experts’ recommendations to remove the requirements for developing an AFCID or ATCID (R2, in the proposed MOD-001-2), or to request NAESB to adopt or develop these requirements in their business practices. These IDs are intended for calculating the AFCs or ATCs for business usage, and do not contribute to ensuring BES reliability. We suggest to remove R2 from the proposed standard.

With regard to the preceding comments, suggest removing all references to ATC and AFC in Requirements R5 and R6.

Requirement R3 stipulates that the TSP develop a Capacity Benefit Margin Implementation Document (CBMID) that describes its method for establishing CBM. R3 does not stipulate the requirement for the
TSP to determine CBM values. Measure M3 implies that the TSP shall determine CBM values using the developed CBMID, and asks current CBM values, or other evidence (such as written documentation, study reports, or supporting information) to demonstrate that it established CBM values consistent with its methodology described in the CBM. The requested evidence does not correspond with the requirement. Therefore, either the requirement needs to be expanded to stipulate the TSP’s obligation in determining CBM values, or M3 be revised to remove references to CBM values. Suggest the latter approach since determination of the CBM values is part of ATC calculation which is regarded a business practice that should be addressed by or mapped to NAESB standards.

The preceding comment also applies to Requirement R4, except in this case, it is the TOP’s Transmission Reliability Margin Implementation Document (CBMID).

R5 is prone to requests for interpretation, as witnessed in a number of past interpretation requests on requirements that stipulate two separate Responsible Entities being held accountable for two different tasks (TOP and BA in some TOP standards). R5 as presented will likely invite requests for interpretation on which entity is responsible for what part of the requirement. Suggest that the SDT consider splitting this requirement into two requirements – one for the TSP to respond to requests on CBMID, and one for the TOP to respond to requests on TRMID and TFC/TTC methodology.

The comment regarding the potential for requests for interpretation for requirements that stipulate two separate Responsible Entities being held accountable for two different tasks also applies to R6. The need for R6 should be reviewed in accordance with the Purpose of the standard, and the intent of Requirements R3 and R4, as commented above. Are the two requirements to stipulate the development of the CBMID and the TRMID only? Or are they also intended to stipulate the requirements for calculating CBM values and TRM values using the established methodologies? If it is the former, then there should not be any request for and response to requests for data provision. If it the the latter, then R3 and R4 need to be revised to clearly stipulate the obligations for calculating such values. The Purpose statement of the standard does not appear to support the latter. Also, as indicated in the preceding comments, determination of CBM values and TRM values is part of ATC calculation which is regarded a business practice that should be addressed by or mapped to NAESB standards.

2. If you have any other comments for the drafting team to consider that you have not already mentioned, please provide them here:

Comments: