Unofficial Comment Form
Project 2010-04 Demand Data (MOD C)
MOD-031-1 (Demand Data)

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 Friday, November 22, 2013.

If you have questions please contact Darrel Richardson or by telephone at 609-613-1848.

The project page may be accessed by clicking here.

Background Information

The Project 2010-04 Demand Data Standard Drafting Team posted an initial draft of the Standard MOD-031-1 (Demand Data) for comment from July 22, 2013 to September 4, 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:

- Modified the definition for Demand Side Management to provide additional clarity
- Added a definition for Net Internal Demand to provide clarity as to what data could be requested
- Modified the Purpose Statement to clearly state the intention of the standard
- Modified Requirement R1 to provide clarity as to:
  - who the data requestor was
  - that the data outlined in the sub-parts was the only data that an entity would need to provide
  - that all or a portion of the data outlined in the sub-parts could be requested
  - the data that could be requested
- Modified Requirement R2 to provide additional clarity as to the entity providing the data and to whom they need to provide the data
- Modified Requirement R3 to clarify that this requirement was only in effect when a Planning Coordinator or Balancing Authority received a request for data from the Regional Entity
- Added Requirement R4 to clarify:
  - the neighboring entities that could request data
  - the conditions for when a data provider could refuse to provide the data
- the data that could be requested
- Modified the VSLs to align with the modified requirements

This posting solicits comment on the revised MOD-031-1 standard. The standard responds to FERC Order 693 and lessons learned from compliance history.

Questions on MOD-031-1

1. **Please provide any issues you have on this draft of the MOD-031-1 standard and a proposed solution.**

Comments: Regarding the definition of Demand Side Management (DSM): It is not clear whether the proposed DSM definition includes conservation and demand management programs. Traditionally, conservation programs have permanence and longevity while demand management has a temporary impact. Suggest revising the DSM definition as follows:

**Demand Side Management (DSM):** All activities or programs undertaken by any applicable entity to reduce Demand. Examples of DSM may include, but are not limited to, Passive Demand Reduction (PDR) and Dispatchable Demand Reduction (DDR) measures, Direct Control Load Management (DCLM), Interruptible Load, critical peak pricing (CPP) with control, and Load as capacity resources.

Demand-related technologies are evolving rapidly and are quickly propagating throughout the industry. The standard should be designed to accommodate change and increasing DSM market penetration as well. Suggest defining two broad categories of demand-related technologies which are (1) load reductions, and (2) capacity-related, as follows:

**Passive Demand Reduction (PDR)** – Non-dispatchable related technologies reduce peak load and energy consumption.

It is anticipated that the Total Internal Demands and Net Energy for Load will reflect these PDR reductions. Typically they are not netted out of the normalized Total Internal Demand. PDR’s are not under the control or supervision of the System Operator.

**Dispatchable Demand Reduction (DDR)** – Dispatchable related technologies to reduce peak load and energy consumption.

Generally, these DDR resources can be counted as equivalent to installed capacity, and may receive installed capacity credits similar to those provided traditional installed generating resources. DDR’s are under the control or supervision of the System Operator.
Regarding the definition of Total Internal Demand: It is not clear what the intent of the meaning of the term "Firm" in the definition of Total Internal Demand is. Load forecasts are total load, regardless of whether it is firm (assuming not counting interruptible load). Interruptible load is not forecasted. More clarity is required for this definition.

Requirements:

Regarding Requirement R1, Part 1.1, and sub-parts 1.3.5, 1.4.5 and 1.5.4, depending on market design, the Planning Coordinators and/or Balancing Authority may be in the best position to determine this data. Transmission Planners, Load Serving Entities and Distribution Providers may not be able to provide or determine this data.

Part 1.5 may lead to the use of inconsistent reporting and forecasting methodologies and/or double-counting of demand-related resources. The Planning Coordinator or Balancing Authority should specify an expected reporting and forecasting basis for Total Internal Demand, Net Energy for Load and Demand Side Management data from Applicable Entities in their area, including the reporting of Passive Demand Reduction and Dispatchable Demand Reduction adjustments.

Each Applicable Entity should verify that no double-counting exist in its reporting. Recommend that a requirement be added to require that each Applicable Entity verify that no double-counting exist in its reporting.

Each Planning Coordinator, Planning Authority, Transmission Planner, Balancing Authority, Resource Planner, Load-Serving Entity, and Distribution Provider shall verify that no double-counting of demand-related resources exist in its reporting.

Also recommend that a new requirement be added to establish that the PC or BA have responsibility for verifying that there is no double-counting across LSE’s and DP’s reporting.

Each Planning Coordinator, Planning Authority or Balancing Authority shall verify that no double-counting of demand-related resources exists in the reported data.