**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: X

   No:

   Comments: 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.

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: X

   No:

   Comments: