Unofficial Comment Form
Project 2010-04 Demand Data

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the draft MOD-031-1 standard. The electronic comment form must be completed by 8:00 p.m. ET on **Wednesday, September 4, 2013**

If you have questions please contact [Darrel Richardson](#) via email or by telephone at 609-613-1848.

The project page may be accessed by clicking [here](#).

**Background Information**
NERC Reliability Standards MOD-016, -017, -018, -019, and -021 (referred to herein as the “MOD C” standards), were approved in the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) Order No. 693. Collectively, the MOD C standards pertain to the collection of data necessary to analyze the resource needs to serve peak demand while maintaining a sufficient margin to address operating events as follows:

- **MOD-016-1.1 - Documentation of Data Reporting Requirements for Actual and Forecast Demands, Net Energy for Load, Controllable Demand-Side Management**
  - Is the umbrella standard that contains the documentation required for the data collection requirements.
- **MOD-017-0.1 - Aggregated Actual and Forecast Demands and Net Energy for Load**
  - Provides for the data requirements for actual and forecast peak demand 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**
  - Provides for the 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**
  - Provides for the collection 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**
  - Provides for the documentation of how Demand-Side Management demands are accounted for in demand and energy forecasts.

NERC initiated an informal development process to address directives in Order No. 693 to modify certain aspects of the MOD C standards. The first informal meeting was held in February 2013 at NERC’s Washington, D.C. office. Participants were industry subject matter experts (SMEs), NERC staff, and staff...
from FERC’s Office of Electric Regulation. The small ad hoc group of SMEs participated in discussions about the outstanding FERC directives and possible resolutions to address the directives. The group also discussed the six standards (MOD-016 through MOD-021) and identified issues with the present standards. The group very quickly identified MOD-020 as dealing with the operational time frame and concluded that it should not be addressed with the other standards at this time since they were applicable to the planning horizon.

Although a pure data reporting standard would be a candidate for retirement under Paragraph 81, the data being collected has a reliability purpose in the development of future assessments for resource adequacy. It was decided to present a pro forma standard that consolidates the remaining five MOD C standards into a single standard. Creating a single standard provides a means of ensuring data will be collected and shared among the necessary parties (LSEs, BAs, TPs, etc.) in both the United States and Canada.

This posting is soliciting comment on a pro forma standard and a Standard Authorization Request (SAR).

You do not have to answer all questions. Enter comments in simple text format. Bullets, numbers, and special formatting will not be retained.
Questions

1. Do you have any specific questions or comments relating to the scope of the proposed standard action or any component of the SAR outside of the pro forma standard?

☒ Yes
☐ No

Comments: The SAR should not be posted with the Standard. The intent of posting a SAR for comment is to seek industry’s input on the need and scope of a proposed standard’s development or revision. Posting the Standard for comments and ballot means that the SAR is “water under the bridge”, and that industry’s input on the SAR doesn’t mean anything.

2. Proposed MOD-031-1 consolidates and replaces the topics previously addressed by MOD-016 through MOD-019, and MOD-021, in addition to incorporating improvements and approaches to meet remaining directives. Do you agree with the approach in MOD-031-1?

☒ Yes
☐ No

3. If you have any specific comments on MOD-031-1, please indicate them here.

Comments: We agree with the approach of combining the standards into one. Specific comments follow.

The Implementation Plan Effective Dates section should be modified to indicate that “MOD-001-2 and the modified DMS definitions shall become effective as follows:”

The definition of Demand Side Management is vague. It is not clear whether this definition includes conservation and demand management programs. Traditionally, conservation programs have permanence and longevity while demand management have temporary impacts. Conservation would include energy efficiency or building envelope improvements whereas demand management would lead to temporary load reductions or load shifting through price signals, contracts or direct load control. Clarify in the standard.

R1 appears to make the PC and BA responsible to develop and issue a data reporting request on the RE formulating such a request. Suggest deleting “as identified by the Regional Entity in a data request” and replace the wording with:
And provide to the Regional Entity upon request.

Subrequirements 1.4 through 1.7 should be combined into a separate requirement starting with:

Each Planning Coordinator or Balancing Authority shall make a request for actual data that shall include, but not be limited to:

Regarding part 1.5.3, it asks for forecasts of Interruptible Load and Direct Control Load Management for summer and winter peak conditions. Does this intend to capture the effective seasonal capacity as opposed to the total capacity for each season? This part needs clarification as to what exactly the PC or BA needs to specify in the data reporting request and what exactly the Applicable Entities need to provide.

Regarding part 1.7, the peak referenced here should be annual peak.

There aren’t any VSLs for non-compliance with parts 1.4.3 and 1.4.4.

Regarding R2, there is a data confidentiality issue if the Applicable Entities are to provide demand forecast data to entities that engage in market activities, such as a LSE. Suggest to qualify R2 by appending “subject to confidentiality requirements” after “on request”.

The proposed effective date may conflict with Ontario regulatory practice with respect to the effective date of the Standard. Note that there is an approval requirement in Ontario for NERC Reliability Standards. The wording presented in the Effective Dates Section does not reflect this. It is suggested that this conflict be removed by moving the wording: “...or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities” to immediately after “applicable regulatory approval” in the first sentence.

In some cases the Standard is overly perscriptive. Variations on the data reporting request shown in the Standard can be used to produce an effective load forecast. To allow for these variations the following changes are recommended:

R1. The Planning Coordinator or Balancing Authority, as identified by the Regional Entity in a data request, shall develop and issue a data reporting request associated with a data request issued by the Regional Entity. This data reporting request shall include consider, at a minimum: [Violation Risk Factor: Medium] [Time Horizon: Long-term Planning]

1.4.3. Monthly or seasonal and annual peak hour weather normalized actual demands in MW for the prior year.
For part 1.4.4, it is of note that Load Management can be dispatched for several reasons including audit, economic and reliability. To clarify the following modification is recommended.

1.4.4. Monthly and annual peak hour deployed Interruptible Load and Direct Control Load Management in MW along with reason for deployment for the prior year.