

# Unofficial Comment Form

## Project 2012-05 ATC Revisions

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](#) to submit comments on the draft MOD-001-2 standard. The electronic comment form must be completed by 8:00 p.m. ET on **Monday, August 26, 2013**.

If you have questions please contact [Ryan Stewart](#) via email or by telephone at 404-446-2569.

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

### Background Information

On November 24, 2009, FERC issued Order No. 729, *Mandatory Reliability Standards for the Calculation of Available Transfer Capability, Capacity Benefit Margins, Transmission Reliability Margins, Total Transfer Capability, and Existing Transmission Commitments and Mandatory Reliability Standards for the Bulk-Power System*. From this Order there are 20 outstanding directives, which are explained in detail in the technical white paper (see project page).

The informal consensus building for MOD A began in February 2013. Specifically, the ad hoc group engaged stakeholders on how best to address the FERC directives, paragraph 81 candidates, and results-based approaches. A discussion of the ad hoc group's consensus building and collaborative activities are included in the technical white paper.

Based on stakeholder outreach, the MOD A ad hoc group has developed one revised reliability standard that addresses the FERC directives, paragraph 81 candidates, and making the requirements more results-based while consolidating the MOD A standards (MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030) into a single standard covering the reliability-related impact of ATC and AFC calculations.

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.

## Question

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: We agree with the general direction and the scope of revisions proposed in the SAR. However, there is a basic process and due diligence issue that deserves more focus than is being proposed. The basic issue is not so much about combining some displaced requirements; the issue is “What should be retained in the NERC Reliability Standards and what should be mapped to and adopted by NAESB as business practices, and what is NAESB’s input to the proposed mapping and what is its work plan to implement such mapping.”

It must be emphasized that there is apparently a lack of coordination with other standard setting organizations to ensure the proposed retirements are properly managed and that parallel standard development activities will take place to implement standard changes at the same time.

In general, we believe that regulatory authorities and industry participants support the concept that NERC address reliability and that NAESB address business practices. The Industry needs to weigh in on the discussion that leads to a recommendation as to which part goes where. However, as proposed, this posting is as a reliability standard only – there are no questions regarding the business practices or the NAESB issue. The SAR states that part of the objective is to retire market-based requirements, which we support; but the SAR is silent on any details which provide specificity on the scope of the proposed retirements, or transfer of the retired requirements to other standard setting organizations. The mapping document does not provide specific recommendations on which retired requirements are to be transferred to NAESB or other standard setting organizations. It is conceivable that some of the retired requirements will not have a home elsewhere but industry participants will need to adhere to such requirements, which may be processes or procedures, to support their business activities.

Based on our understanding, NAESB has not been engaged in providing inputs on the proposed retirement, nor does it have any work plan to implement any or all of the proposed retired requirements. The draft Implementation Plan being posted mentions a proposed coordination process, but until NAESB has provided its inputs, the proposed process has not yet received the support from the party who is partly responsible for the successful and timely transfer of the NERC retired requirements. In previous projects, a close coordination between NERC and NAESB was achieved to ensure both parties agreed on the proposed mapping of NERC standard requirements, and that both were able and ready to implement the proposed changes to ensure a smooth transition without unduly impacting industry participants. For

this project, from the available documents and based on our knowledge of the current activities, we are not convinced that the needed coordination with and inputs from NAESB have taken place.

2. Are there any specific elements from the original MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, or MOD-030 that you believe are critical to reliability that have not been retained? Please explain.

Yes

No

Comments:

3. Please specify if you have comments or proposed changes to any of the Requirements of the pro forma standard.

Comments:

(1) We do not agree with the Purpose statement as presented as it contains an unclear objective. The Purpose statement starts off with “To ensure the reliable calculation of Total Flowgate Capability (TFC) and Total Transfer Capability (TTC) values...”. We do not think it appropriate to have an objective of “reliable calculation” in a NERC Reliability Standard; rather, we would see a need for a Reliability Standard having an objective to calculate TTC and ATC whose values provide a reliability basis for transmission service reservation and utilization. We therefore suggest the Purpose statement be revised as follows:

Purpose: (1) To ensure the calculated values of Total Flowgate Capability (TFC) and Total Transfer Capability (TTC) provide a reliability basis when those values are used by a Transmission Service Provider to calculate Available Flowgate Capability (AFC) or Available Transfer Capability (ATC) or used by a Reliability Coordinator; (2)....

Further, Items (2) and (3) in the Purpose statement are not objectives or desired outcomes, they are actions or requirements. We suggest that (2) and (3) be reworded and combined as follows:

To ensure sharing of information on the methodology and calculated values of TFC, TTC, AFC, ATC, Capacity Benefit Margin (CBM), and Transmission Reliability Margin (TRM) with entities having a reliability need for the information.

(2) Part 1.1: It is unclear to us what the “this” in “A description of how this is accomplished;” means. Is it the statement required in Part 1.1, or is it the methodology or the incorporation of facility ratings,

voltage limits, and stability limits pre and post-contingency. This is unclear and can lead to a Responsible Entity being unable to meet the Standard's requirements.

- (3) R3: The second part is not required. If a TSP does not use CBM, then there is no need for the TSP to have a CBMID on which the TSP states that it doesn't use CBM. This exclusion can be stated in the Applicability Section, or in the Measures.
- (4) R4: Same comment as in (3) preceding, except this is for TRM.
- (5) R5: The main requirement stipulates that: "Within 30 calendar days of receiving a written request that references this requirement...", it is unclear whether "this requirement" means R5, and if so, it would be clearer to just say Requirement R5. Also, do the requesting entities need to reference R5 to substantiate a request? If so, what is the rationale behind having to make this reference when the latter part of the requirement addresses the alternative scenarios in which such a reference is not required?

NPCC participating members believe that requirements R5 and 6 should be eliminated under the P81 criteria; and therefore suggest deleting. However, if the Standard Drafting Team believes these Requirements are necessary for reliability we request an explanation and offer the following corrections:

- (6) R5, Parts 5.2 and 5.3: According to R3 and R4, the TSP is required to develop a CBMID whereas the TOP is required to develop a TRMID. However, Part 5.1 requires that the TOP provide the CBMID while the TSP is required to provide the TRMID upon requests. The responsibilities of the TOP and the TSP seem to be incorrect in meeting the requests.
- (7) M5: Requirement R5 holds the TOP and TSP responsible for responding to requests for information. However, Measure M5 only lists the examples of evidence that the TSP needs to provide, but not the TOP. There is thus no Measure for the TOP to aid its provision of evidence to demonstrate compliance. We suspect this is an oversight.
- (8) R6: the same comment with respect to making a reference to "this requirement" as noted in (7) preceding.
- (9) R6, Part 6.1: This part appears to be a requirement for the requesters, but the part is not written to clearly indicate that. To avoid being interpreted as a requirement for the requester, we suggest to revise the main requirement R6 as follows:

R6. Within 30 days of a written request that references this requirement from another Transmission Service Provider or Transmission Operator that specifies that the data is for use in the requesting

party's AFC, ATC, TFC, or TTC calculations, a Transmission Service Provider or Transmission Operator shall share data used in their respective AFC, ATC, TFC, or TTC calculations (subject to confidentiality, regulatory, or security requirements).

The proposed change will turn an apparent requirement for the requesters into a condition for a valid request.

- (10) R6, Part 6.2: This is not a requirement, but a provision for the TSP and TOP to not have to do anything extra. We do not see the need for having this part to anticipate that there will be requests for data in a format that is different than the one a TSP or TOP uses, maintains, or currently makes available to others. If the SDT really wants to relieve the burden of the TSP and TOP from having to change the data format when such requests are made, the SDT may want to insert words such as "in the format that is currently used, maintained or made available" prior to "in their respective..." in the main requirement.