Unofficial Comment Form

Project 2010-03 Modeling Data

Please **DO NOT** use this form for submitting comments. Please use the [electronic form](https://www.nerc.net/nercsurvey/Survey.aspx?s=94f0ab05e1bd49b7bb07e5a884b40780) to submit comments on the draft MOD-033-1 standard. The electronic comment form must be completed by 8:00 p.m. ET on **January 21, 2014.**

If you have questions please contact Steven Noess via email or by telephone steven.noess@nerc.net or 404-446-9691.

The project page may be accessed by [clicking here](http://www.nerc.com/pa/Stand/Pages/Project2010-03ModelingData%28MOD-B%29.aspx).

## Background Information

NERC Reliability Standards MOD-010 through MOD-015 address modeling data requirements that support the mathematical model representations of transmission, generation, and load that are the foundation of virtually all power system studies. Only two of those standards were approved by the Federal Energy Regulatory Commission (“FERC” or “Commission”) in Order No. 693. Four of them were neither approved nor remanded, and they remain in a pending status. Two new reliability standards are proposed. The proposal includes a combined modeling data standard to replace MOD-010 through MOD-015, MOD-032-1 (Data for Power System Modeling and Analysis), and a new validation standard to address directives related to validation, MOD-033-1 (Steady-State and Dynamic System Model Validation).

The Project 2010-03 Modeling Data Standard Drafting Team posted an initial draft of MOD-032-1 and MOD-033-1 for comment from July 22 to September 4, 2013. The drafting team revised the standards based on stakeholder recommendations, and changes made to the standards are redlined and accessible from the project page.

This posting solicits comment on the revised MOD-033-1 standard. The standards respond to directives remaining from FERC Orders No. 693 and No. 890, and a summary of those directives with explanation of how the approach addresses them is available in the “Consideration of Issues and Directives” document on the project page.

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. In draft 2 of proposed MOD-033-1 (Steady-State and Dynamic System Model Validation), Requirement R1, part 1.2, required “Comparison of the performance of the Planning Coordinator’s portion of the existing system in a planning dynamic model to actual system response, through simulation of a dynamic local event, at least once every 24 calendar months. If no dynamic local event occurs within the 24 calendar months, use the next dynamic local event that occurs.” In response to comments, the SDT agreed that some might benefit from additional clarity of the SDT’s intent in part 1.2. In response, the SDT confirms that the intent of the requirement is to complete comparison using a dynamic local event within 24 months of the last dynamic local event used in comparison and to complete each comparison within 24 months of the dynamic local event. The SDT has rephrased part 1.2 to clarify the intent of the requirement to ensure that it is clear that a PC will not face a timing scenario that makes it impossible to comply. Specifically, the SDT added language to clarify that the reference of “at least once every 24 calendar months” means that the PC must “use a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison, and complete each comparison within 24 calendar months of the dynamic local event.” This was the only change in the standard that may be substantive. Do you agree with the clarification? If not, please provide suggested alternative clarifications.

[ ]  Yes

[ ]  No

Comments: