

Individual or group. (9 Responses)
Name (5 Responses)
Organization (5 Responses)
Group Name (4 Responses)
Lead Contact (4 Responses)
Question 1 (8 Responses)
Question 1 Comments (9 Responses)
Question 2 (8 Responses)
Question 2 Comments (9 Responses)
Question 3 (8 Responses)
Question 3 Comments (9 Responses)
Question 4 (0 Responses)
Question 4 Comments (9 Responses)

Group
Northeast Power Coordinating Council
Guy Zito
Yes
Yes
Yes
Individual
Anthony Jablonski
ReliabilityFirst
Yes
Yes
Yes
ReliabilityFirst agrees with that the redlined changes further clarify the intent of R3.1 but noticed one typo. The term "Daily" in part 3.1.3 should not be capitalized since the term "Daily" is not a definition listed in the NERC Glossary of terms.
Individual
Greg Rowland
Duke Energy
No
The Rapid approach method would have been sufficient had the response been limited to only the request for clarification. This revision goes beyond the scope of the original request for clarification by modifying the VRFs as well as the Compliance Enforcement and Data Retention portions of Section D. While these additional changes may simply be conforming changes to match a new Standards pro-forma template, they should be addressed and explained along with the other provided background information.
Yes
Yes
We are OK with the changes made to Requirement 3, but, in the interest of full disclosure, we expect that some explanatory language should be included to address the changes made not related to the

FPL Request for Interpretation.
Individual
Ross Kovacs
Georgia Transmission Corporation
Yes
Yes
No
The proposed revision goes beyond the issue raised in the interpretation request. The VRF levels have been changed to "PENDING". The SAR states, "Because FERC has not yet ruled on the VRFs for this standard, they have been marked as PENDING in order to not distract from the discussion of the modification." Please describe what input was given by the Interpretation Team. Please describe how this change was done in accordance with Reliability Standards Consensus Development Process – Step 5 of the Reliability Standards Development Procedure. In Order 729, "the Commission accepts the ERO's commitment to reevaluate the violation risk factors and violation severity levels associated with these MOD Reliability Standards through an open stakeholder process to ensure that they are consistent with the intent of violation risk factor definitions and Commission precedent." Changing the VRF levels in this "Rapid" approach and requesting a parallel vote prior to obtaining industry feedback (1) is not an open stakeholder process, (2) is making changes to one MOD standard while leaving the other MOD standards unchanged, (3) leaves auditors and the industry without any guidance as to the VRFs for MOD-028-2 requirements, and (4) does not appear in accordance with the Reliability Standards Development Procedure. GTC recommends following the Commission's determination outlined in Order 729 to reevaluate the VRFs associated with ALL of the proposed MOD Reliability Standards through a separate, open stakeholder process which could ensure the VRFs and VSLs are consistent with the intent of violation risk factor definitions and Commission precedent. Until this can be done, the VRFs should remain the same as MOD-028-1.
Individual
Joe Petaski
Manitoba Hydro
Yes
It is appropriate to use the rapid development process in this case because only clarifications, not substantive changes, have been made to the standard.
Yes
Yes
Group
NCEMC Reps
James R. Manning
Yes
Yes
No
The proposed changes do not appear to solve the original ambiguity. Because 3.1.2 describes using "A daily or hourly load forecast for TTCs used in current-day and next-day ATC calculations", a registered entity might still believe that it has to calculate hourly TTCs. A clarification is needed that hourly load forecasts are required if the TOP uses hourly TTCs and daily load forecasts are needed if

the TOP calculates a single TTC for a day.
Individual
Annie Lauterbach/Laura Trolese
Bonneville Power Administration
BPA has no comments or concerns at this time as BPA does not implement this standard.
Group
ACES Power Marketing Standards Collaborators
Jason L. Marshall
Yes
We agree that the "Rapid" modification approach will work for a standard such as this where clarification of a single requirement is needed. This seems to be a much quicker way to get the clarification we need.
Yes
No
The proposed changes do not appear to solve the original ambiguity. Because 3.1.2 describes using "A daily or hourly load forecast for TTCs used in current-day and next-day ATC calculations", a registered entity might still believe that it has to calculate hourly TTCs. A clarification is needed that hourly load forecasts are required if the TOP uses hourly TTCs and daily load forecasts are needed if the TOP calculates a single TTC for a day.
Group
MRO NSRF
Will Smith
Yes
Yes
Yes
NONE