

## Consideration of Opinions on Nonbinding Poll of VRFs and VSLs for FAC-013-2 - Assessment of Planning Transfer Capability for the Near-Term Transmission Planning Horizon — Project 2010-10

**Date of Poll: October 20-November 3, 2010**

**Summary Consideration:** A non-binding poll of VRFs and VSLs for FAC-013 was conducted from October 20 through November 3, 2010; the poll did achieve a quorum - 87% of those who registered to participate provided an opinion, however only 55% of those who provided an opinion indicated support for the VRFs and VSLs that were proposed.

The majority of negative opinions indicated that the VSLs for Requirement R1 contained an overlap or needed additional gradation. The SDT explained that Requirement R1 had been extensively revised and therefore the SDT had modified the VSLs to be consistent with the new Requirement R1. The SDT modified the Requirement R1 Lower and Moderate VSLs to eliminate the overlap. They now read “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT believes that the gradations are now appropriate for each part of Requirement R1.

Several of the negative opinions questioned whether Planning Transfer Capability (PTC) was intended to be analogous with a total transfer capability or an available transfer capability for the long term. In addition some of the negative opinions indicated that PTC was not needed. The SDT explained that the PTC definition had been deleted based on industry comments and the concept of transfer capability assessment in the Near-Term Planning Horizon had been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. In addition, the standard’s emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers, not specific transfer capability values.

A few of the negative opinions indicated the scope of the standard was unclear because it did not specify which entities, lines or paths it applied to. They further stated that they believed this standard should specifically apply to a Planning Authority required by its Regional Reliability Organization to establish interregional and intra-regional Transfer Capabilities. The SDT explained that the purpose of the standard was to require Planning Coordinators to have a method for analysis of the ability to transfer energy (beyond 13 months) to identify potential future weaknesses and limiting facilities. The standard allows each Planning Coordinator to determine the method (transfer level, paths, contingencies,...) that best allows them to identify potential future weaknesses and limiting facilities

December 9, 2010

according to their understanding of the needs of the system. The SDT further explained that the commission stated in Order 693 paragraph 790 “The Commission does not believe that the regional reliability organization should be able to decide the type of entity to which this Reliability Standard applies. ...” and the SDT agrees.

The SDT believes there is a reliability related need for the transfer capability assessment to be conducted. The SDT does not believe the TPL standards adequately cover the need at this time.

A couple of the negative opinions indicated that Requirement R1 Part R1.4 was vague as to the requirement that assumptions and criteria to calculate PTCs be as, or more limiting than the assumptions and criteria used in operating horizon. The SDT explained that the Requirement R1 Part 1.4 (now Requirement R1 Part 1.3) had been revised to require that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator’s planning practices because the purpose of the standard is to support planning for reliable system operation in the planning horizon.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herbert Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

Segment	Company	Balloter	Opinion	Comments
1	Ameren Services	Kirit S. Shah	Negative	We believe the VSLs for R1 should be expanded to include more gradations. Failure to include one element from Parts 1.2 through 1.5 should be a Lower VSL. Failure to include two elements should be a Moderate VSL. Failure to include three elements should be a High VSL. Failure to include four elements should be a Severe VSL.
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address more than two of the items listed in Requirement R1 Part 1.4.” The SDT feels that the gradations are now appropriate for each sub-part.</p>				
1	Avista Corp.	Scott Kinney	Negative	If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read “The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1”
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to</p>				

<sup>1</sup> The appeals process is in the [Standard Processes Manual](#).  
December 9, 2010

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<p>address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT feels that the gradations are now appropriate for each sub-part.</p>				
1	Black Hills Corp	Eric Egge	Negative	<p>We agree with the proposed VRFs, but there is a problem with the VSL for R1.</p> <p>As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read</p> <p style="padding-left: 40px;">The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1</p>
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT feels that the gradations are now appropriate for each sub-part.</p>				

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1	JEA	Ted E Hobson	Negative	<p>Concerning the VSL descriptions/violation triggers: recommend changing Moderate VSL (second part) to:</p> <p>The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement R1, Part 1.1.</p> <p>The changes in severity levels for R2, R3, and R5 should be in multiples of 30 days, not in multiples of 10 days, which seems haphazardly chosen and severe for requirements that all have Lower VRFs.</p> <p>Similarly, R4 should be in multiples of 25% rather than 5%, particularly since there should not be a need to calculate very many PTCs because they should only be calculated for reliability enhancement reasons. Finally, the word “notified” in each VSL for R5 should be replaced with “made available to” in order to be consistent with the wording in R5</p>
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT feels that the gradations are now appropriate for each sub-part.</p> <p>The SDT chose increments for R2, R3 and R5 with increments that vary depending on the content of the requirement. R4 in the initial draft of FAC-013-2 has been replaced; the new VSLs for R4 do not use multiples. The SDT has modified Requirement R5 VSL to address your concern. The SDT feels that the gradations are now appropriate for each sub-part.</p>				
1	Portland General Electric Co.	Frank F. Afranji	Affirmative	<p>PGE agrees with the proposed VRFs, but there is a problem with the VSL for R1. As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1”</p>

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1	Public Service Company of New Mexico	Laurie Williams	Negative	We agree with the proposed VRFs, but there is a problem with the VSL for R1. As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1
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1	Puget Sound Energy, Inc.	Catherine Koch	Negative	We agree with the proposed VRFs, but there is a problem with the VSL for R1. As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1”

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1	Sacramento Municipal Utility District	Tim Kelley	Negative	The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. It is suggested that the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address THREE or more of the items listed in Requirement 1, Part 1.1”
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1	Tampa Electric Co.	Beth Young	Negative	<p>The VSLs for R1 Lower and Moderate are inconsistent or contain an error. Recommend changing Moderate VSL (second part) to “The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement R1, Part 1.1. The High and Severe VSLs for R1 should spell out the numerical 2 and 3 as “two” and “three” for consistency.</p> <p>The changes in severity levels for R2, R3, and R5 should be in multiples of 30 days, not in multiples of 10 days, which seems haphazardly chosen and severe for requirements that all have Lower VRFs. Similarly, R4 should be in multiples of 25% rather than 5%, particularly since there should not be a need to calculate very many PTCs because they should only be calculated for reliability enhancement reasons. Finally, the word “notified” in each VSL for R5 should be replaced with “made available to” in order to be consistent with the wording in R5.</p>
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1	Tucson Electric Power Co.	John Tolo	Negative	<p>agree with the proposed VRFs, but there is a problem with the VSL for R1. As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1”</p>
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2	California ISO	Gregory Van Pelt	Negative	<p>We agree with and support the VRFs, however a revision is needed to the VSL for R1. As currently proposed, there is an overlap (with “two” of the items) appearing in both the Lower and Moderate VSL for R1. If an entity fails to meet “two” of the items listed in requirement R1, Part 1.1, the entity would meet the language currently contained in both the Lower and in the Moderate VSL. We recommend the SDT change the second part of the Moderate VSL to read: “The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement R1, Part 1.1”</p>
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2	Midwest ISO, Inc.	Jason L Marshall	Negative	<p>We thank the drafting team for revising these VRFs to be Lower. While we disagree with the need for the standard, we understand that requirements must include a VRF and support the assignment of “Lower” for the VRFs. We believe the VSLs for R1 should be expanded to include more gradations. Failure to include one element from Parts 1.2 through 1.5 should be a Lower VSL. Failure to include two elements should be a Moderate VSL. Failure to include three elements should be a High VSL. Failure to include four elements should be a Severe VSL.</p>
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3	Florida Power & Light Co.	W. R. Schoneck	Negative	<p>The VSLs for R1 Lower and Moderate are inconsistent or contain an error. Recommend changing Moderate VSL (second part) to “The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement R1, Part 1.1. The High and Severe VSLs for R1 should spell out the numerical 2 and 3 as “two” and “three” for consistency. The changes in severity levels for R2, R3, and R5 should be in multiples of 30 days, not in multiples of 10 days, which seems haphazardly chosen and severe for requirements that all have Lower VRFs. Similarly, R4 should be in multiples of 25% rather than 5%, particularly since there should not be a need to calculate very many PTCs because they should only be calculated for reliability enhancement reasons. Finally, the word “notified” in each VSL for R5 should be replaced with “made available to” in order to be consistent with the wording in R5.</p>
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3	PNM Resources	Michael Mertz	Negative	<p>PNMR agrees with the proposed VRFs, but there is a problem with the VSL for R1. As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1”</p>
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3	Sacramento Municipal Utility District	James Leigh-Kendall	Negative	<p>The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. It is suggested that the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address THREE or more of the items listed in Requirement 1, Part 1.1”</p>
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<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT feels that the gradations are now appropriate for each sub-part.</p>				
5	Louisville Gas and Electric Co.	Charlie Martin	Negative	LG&E and KU Energy support the comments submitted by the Midwest ISO
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT feels that the gradations are now appropriate for each sub-part.</p>				
5	RRI Energy	Thomas J. Bradish	Negative	We agree with the proposed VRFs, but there is a problem with the VSL for R1. As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1”
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to</p>				

Segment	Company	Balloter	Opinion	Comments
<p>address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4.</p>				
5	Sacramento Municipal Utility District	Bethany Wright	Negative	<p>The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. It is suggested that the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address THREE or more of the items listed in Requirement 1, Part 1.1”</p>
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4.</p>				
6	Ameren Energy Marketing Co.	Jennifer Richardson	Negative	<p>We believe the VSLs for R1 should be expanded to include more gradations. Failure to include one element from Parts 1.2 through 1.5 should be a Lower VSL. Failure to include two elements should be a Moderate VSL. Failure to include three elements should be a High VSL. Failure to include four elements should be a Severe VSL.</p>
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT feels that the gradations are now appropriate for each sub-part.</p>				

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6	RRI Energy	Trent Carlson	Negative	We agree with the proposed VRFs, but there is a problem with the VSL for R1. As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4.</p>				
6	Seattle City Light	Dennis Sismaet	Negative	As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address one or two of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address two or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address two of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement 1, Part 1.1”
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4.</p>				

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10	Texas Reliability Entity	Larry D Grimm	Negative	<p>The VSL descriptions are not properly coordinated. For R1, the Lower VSL says “failed to address one or two” while the Moderate VSL, latter part, says “failed to address two or more.” As written, failure to address two items would fall into both Lower and Moderate VSLs. We recommend the Moderate VSL be revised to say “three or more.”</p> <p>For R3, a gap exists between Moderate and High. The Moderate VSL says “after 60 calendar days, but no more than 70 calendar days” while High says “after 80 calendar days.” There is a gap between 71 and 80 days. We recommend the High VSL be revised to say “after 70 calendar days,” which is consistent with the High VSL for R5.</p>
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT has modified the VSL for Requirement R3 to eliminate the gap.</p>				
10	Western Electricity Coordinating Council	Louise McCarren	Negative	<p>We agree with the proposed VRFs, but there is a problem with the VSL for R1. As proposed there is overlap between the Lower and Moderate VSL for R1. The Lower VSL reads: The Planning Coordinator has a PTCMD but failed to address ONE OR TWO of the items listed in Requirement R1, Part 1.1. The second part of the Moderate VSL reads: The Planning Coordinator has a PTCMD but failed to address TWO or more of the items listed in Requirement 1, Part 1.1 If the PC has a PTCMD but failed to address TWO of the items listed in Requirement R1, Part 1.1, they would meet the language of both the Lower and the Moderate VSL. We suggest you change the second part of the Moderate VSL to read The Planning Coordinator has a PTCMD but failed to address THREE or more of the items listed in Requirement 1, Part 1.1</p>
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT feels that the gradations are now appropriate for each sub-part.</p>				

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10	ReliabilityFirst Corporation	Anthony E Jablonski	Negative	<p>ReliabilityFirst generally agrees with the VRFs. ReliabilityFirst voted negative on this poll due to the VSL designations as listed below:</p> <ol style="list-style-type: none"> <li>1. R1 – if the PC failed to address two of the items listed in Requirement R1, Part 1.1, they would fall under both the Moderate and High VSL designation.</li> <li>2. R2 - the designation of number of days is not inclusive. For example, where does an entity fall if they are 30 days late? The Moderate VSL states “not more than 40 calendar days” and the High VSL states “more than 40 calendar days”. If an entity is 40 calendar days late where do they fall (Moderate or High)?</li> <li>3. R3 - Same type of comment for R2</li> <li>4. R4 – Requirement R4 has a time requirement within it (at least once each calendar year) which is not stated within the VSL</li> <li>5. R5 – Same type of comment for R2. Also, the High VLS is open ended (“more than 70 calendar days after their verification and recalculation”). For example, if an entity was either 71 calendar days or 500 calendar days late, they would still fall under the High VSL.</li> </ol>
<p><b>Response:</b> Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1 and your comments. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirement R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A High VSL was assigned for failure to address four of the items listed in Requirement R1 Part 1.4 – and a Severe was assigned for failure to address more than four of the items listed in Requirement R1 Part 1.4. The SDT feels that the gradations are now appropriate for each sub-part.</p> <p>Regarding your comment concerning R2, using your example, an entity that is 30 days late would be in the lower VSL while an entity that is 40 days late would be in the moderate VSL.</p> <p>Regarding your comment concerning R3 and R5 the SDT believes that the time periods used in the VSLs are clear and do not require further modification. The SDT agrees with your comment concerning R4 and has modified the VSL to address the “once each calendar year” issue.</p>				
1	Beaches Energy Services	Joseph S. Stonecipher	Negative	(See my comments on the associated Comment Form.)
<p><b>Response:</b> Please refer to responses on the “Consideration of Comments on Modifications to FAC-012 and FAC-013 for Order 729 Draft FAC-013-2 Standard — Project 2010-10”.</p>				
1	Idaho Power Company	Ronald D. Schellberg	Negative	PTCs are not needed.
<p><b>Response:</b> The SDT agrees and has dropped the term. The standard’s emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The industry does not support calculation of ATC beyond the operating horizon. The SDT believes there is a reliability related need for the transfer capability assessment to be conducted.</p>				

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1	Keys Energy Services	Stan T. Rzad	Negative	It is unclear whether PTC is intended to be analogous with a total transfer capability or an available transfer capability for the long term. Without that clarity, there will be inconsistency on what PTC means to difference PCs. It is important to the value of the standard and to gain consistency to clarify this and to enable those entities who receive the information to understand both the allegorical total and available transfer capabilities. Please see FMPA's comments submitted through the formal process for more detail.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.</p>				
1	Lake Worth Utilities	Walt Gill	Negative	It is unclear whether PTC is intended to be analogous with a total transfer capability or an available transfer capability for the long term. Without that clarity, there will be inconsistency on what PTC means to difference PCs. It is important to the value of the standard and to gain consistency to clarify this and to enable those entities who receive the information to understand both the allegorical total and available transfer capabilities. Please see FMPA's comments submitted through the formal process for more detail.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.</p>				
1	Platte River Power Authority	John C. Collins	Negative	Much confusion between "Transfer Capabilities" and "SOLs" was introduced in the beginning. NERC planned to reduce this confusion by retiring FAC-012 and -013 along with implementation of the new MOD standards. The proposed FAC-013-2 fuels more confusion and is not necessary. We have FAC-010-2.1 that addresses the SOL methodology to be used by those calculating transfer capabilities in the Planning Horizon.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOL's.</p>				
2	Independent Electricity System Operator	Kim Warren	Negative	We do not agree with the need for the two new definitions, hence we do not agree with the requirements and the VRFs and VSLs.
<p><b>Response:</b> The two new definitions for PTC and PTCMD have been removed from the standard in response to industry comments. The SDT has revised the</p>				

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Requirements and the associated VSL.				
3	City of Green Cove Springs	Gregg R Griffin	Negative	It is unclear whether PTC is intended to be analogous with a total transfer capability or an available transfer capability for the long term. Without that clarity, there will be inconsistency on what PTC means to difference PCs. It is important to the value of the standard and to gain consistency to clarify this and to enable those entities who receive the information to understand both the allegorical total and available transfer capabilities. Please see FMPA's comments submitted through the formal process for more detail.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.</p>				
3	Southern California Edison Co.	David Schiada	Negative	<p>The proposed FAC-013-2 requires the Planning Coordinator to develop and document a Planning Transfer Capability Methodology Document (PTCMD), to issue a PTCMD to identified entities, to respond to technical questions regarding the PTCMD, and to verify or recalculate Planning Transfer Capabilities (PTCs) at least once a year. SCE has reviewed FAC-013-2 and generally agrees that the requirements included in the standard are appropriate for the calculation of PTCs. However, confusion exists regarding the need to calculate PTCs. Other NERC standards, such as FAC-010 and FAC-014, require the Planning Coordinator to have a documented methodology and to follow that methodology in calculating its System Operating Limits (SOLs). The proposed FAC-013-2 does answer SCE's questions about how calculating PTCs differs from calculating Total Transfer Capability and/or SOLs. In its responses to comments from the last posting of the standard, the drafting team indicated that there was no relationship between the FAC-010/FAC-14 and FAC-013. The drafting team indicated that FAC-010/FAC-14 deal with calculation and communication of SOLs, while FAC-013 only requires calculation of PTCs according to the Planning Coordinator's PTCMD, which is based on the PC's criteria. The drafting team asserted that PTCs may be calculated between areas where no SOL is established. However, this response does not clear up the confusion related to the difference between a PTC and an SOL. Because of this confusion, SCE believes that additional clarification in FAC-013-2 is required.</p>
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's</p>				



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emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOL's.				
4	Florida Municipal Power Agency	Frank Gaffney	Negative	It is unclear whether PTC is intended to be analogous with a total transfer capability or an available transfer capability for the long term. Without that clarity, there will be inconsistency on what PTC means to difference PCs. It is important to the value of the standard and to gain consistency to clarify this and to enable those entities who receive the information to understand both the allegorical total and available transfer capabilities. Please see FMPA's comments submitted through the formal process for more detail.
<b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.				
5	Florida Municipal Power Agency	David Schumann	Negative	It is unclear whether PTC is intended to be analogous with a total transfer capability or an available transfer capability for the long term. Without that clarity, there will be inconsistency on what PTC means to difference PCs. It is important to the value of the standard and to gain consistency to clarify this and to enable those entities who receive the information to understand both the allegorical total and available transfer capabilities. Please see FMPA's comments submitted through the formal process for more detail.
<b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.				
6	Florida Municipal Power Agency	Richard L. Montgomery	Negative	It is unclear whether PTC is intended to be analogous with a total transfer capability or an available transfer capability for the long term. Without that clarity, there will be inconsistency on what PTC means to difference PCs. It is important to the value of the standard and to gain consistency to clarify this and to enable those entities who receive the information to understand both the allegorical total and available transfer capabilities. Please see FMPA's comments submitted through the formal process for more detail.
<b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.				

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5	Xcel Energy, Inc.	Liam Noailles	Negative	Much confusion exists regarding the practical distinction between “Transfer Capability”, “Total Transfer Capability” and “System Operating Limit” in general and, in particular, regarding their significance as applied within the Western Interconnection. NERC planned to reduce this confusion by retiring FAC-012 and FAC-013 concurrent with the implementation of the MOD-028/029/030 standards addressing the transfer capability methodologies. The proposed FAC-013-2 fuels more confusion and is not necessary. We have FAC-010 that addresses the SOL methodology which, together with MOD-028/029/030 for transfer capability methodology, comprises a fully adequate suite of methodologies for calculating Transfer Capabilities in the Planning Horizon.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard’s emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOL’s. The SDT believes there is a reliability related need for the transfer capability assessment to be conducted. The SDT does not believe the standards referenced adequately cover the need at this time.</p>				
6	Platte River Power Authority	Carol Ballantine	Negative	Much confusion between “Transfer Capabilities” and “SOLs” was introduced in the beginning. NERC planned to reduce this confusion by retiring FAC-012 and -013 along with implementation of the new MOD standards. The proposed FAC-013-2 fuels more confusion and is not necessary. We have FAC-010-2.1 that addresses the SOL methodology to be used by those calculating transfer capabilities in the Planning Horizon.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard’s emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOL’s.</p>				
1	Orlando Utilities Commission	Brad Chase	Negative	This standard requires that you document how you calculate ATC in the planning horizon if you use it -The standard (arguably) doesn’t require you to calculate ATC in the planning horizon if you don’t use it *However it would probably be safer to calculate one then argue you don’t use it. -The standard set’s no performance criteria, negative ATC is as good as positive ATC. *However if you do calculate a negative value, that becomes available for FERC to review and while it may not be strictly a standard violation, FERC could argue that you “aren’t meeting your firm obligations”
<p><b>Response:</b> The standard does not require the calculation of ATC in the planning horizon. The PTC definition has been deleted based on industry comments</p>				

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<p>and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.</p>				
6	Florida Municipal Power Pool	Thomas E Washburn	Negative	<p>Unofficial Comment Form for Project 2010-10 — Modifications to FAC-012 and FAC-013 for Order 729 — Draft FAC-013-2 Standard Please DO NOT use this form. Please use the electronic comment form located at the link below to submit comments on the proposed SAR and modifications proposed FAC-013-2 — Planning Transfer Capability. Comments must be submitted by November 3, 2010. If you have questions please contact Darrel Richardson at Darrel.richardson@nerc.net or by telephone at 609-613-1848.</p> <p><a href="https://www.nerc.net/nercsurvey/Survey.aspx?s=e90004c891d2475ea8f1f74a35d5e2ba">https://www.nerc.net/nercsurvey/Survey.aspx?s=e90004c891d2475ea8f1f74a35d5e2ba</a> Background Information: The SAR for Project 2010-10 – Modifications to FAC-012 and FAC-013 for Order 729 proposes modifications to the following standards: • FAC-012-1 — Transfer Capability Methodology • FAC-013-1 — Establish and Communicate Transfer Capabilities In Order 729, FERC ruled that the ATC standards developed in Project 2006-07 did not completely address the topics covered in FAC-012 and -013 and did not fully address the associated directives from Order 693. Accordingly, FERC denied the portions of the implementation plan that would have retired these standards, and instead directed NERC to use the standards development process to make changes to the FAC standards and file those changes with FERC no later than 60 days prior to the effective date of the standards, which is April 1, 2011 (requiring the proposed changes to be filed on or before January 31, 2011). NERC has an obligation to address FERC's directives. It is the intent to identify all the applicable FERC directives and incorporate them in the draft standard. A second draft of the proposed standard has been developed that attempts to address the applicable FERC directives as well as address concerns raised by the industry during the first posting. Please review the proposed draft standard in its entirety and answer the following questions by using the electronic comment form. You do not have to answer all questions. Enter all comments in Simple Text Format.</p> <p>1. The SDT has modified the definition of Planning Transfer Capability (PTC). The definition now reads “The Transfer Capability that is calculated for the planning period beyond 13 months.” Do you agree that the revised definition provides additional clarity as to the time period for the calculations?</p> <p>0 Yes 1 No</p> <p>Comments: It is unclear whether PTC is allegorical to TTC or to ATC. The term</p>

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				<p>should be modified to clarify whether PTC is the total or the incremental available. Without this clarity, on PC might calculate a total whereas its neighboring PC calculate an incremental available value and the numbers will be dramatically different causing confusion. Also, it leaves the values of PTC open to interpretation. FMPA recommends that PTC be calculated as the total; however, the PC should also report the TRM, CBM and existing long term firm commitments assumed so that entities understand that the total may not all be available (e.g., in the PTCMD).</p> <p>2. The SDT has modified the definition of Planning Transfer Capability Implementation Document (PTCID) so that it is now called Planning Transfer Capability Methodology Document (PTCMD). The definition now reads “A document that describes the process for calculating Planning Transfer Capability (PTC).” Do you agree that the revised definition provides additional clarity as to the purpose of the document? 0 Yes 1 No Comments: Mention should be made of the assumptions as well as the process / method</p> <p>3. The SDT has modified the Requirements to include data and modeling information as well as provide for additional clarity regarding the intent of the Requirement. Do you agree that the revised Requirements accomplish this goal? 0 Yes 1 No Comments: A new sub-requirement should be added that requires listing of existing long term firm point to point transmission service that would consume PTC (assuming PTC is a “total” and not an “available” number).</p> <p>4. The SDT has modified the VRFs to better align with the risk associated with the Requirements. Do you agree that the VRFs are now more consistent with regards to the risk associated with the Requirements? 1 Yes 0 No Comments:</p> <p>5. The SDT has modified the Measures to better align with the Requirements. Do</p>

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				<p>you agree that the Measures are now more consistent with the Requirements? 0 Yes 1 No</p> <p>Comments: M3 and M4 are simply restatements of the requirements. FMPA suggests adding “such as (examples of evidence)” statements similar to those provided in M1, M2 and M5.</p> <p>6. The SDT has modified the VSLs to better align with the severity of non-compliance associated with the Requirements. Do you agree that the VSLs are now more consistent with regards to the severity of non-compliance associated with the Requirements? 1 Yes 0 No Comments:</p> <p>7. When reviewing the mapping document posted with the proposed FAC-013-2 standard, do you believe that the proposed standard (considering only the requirements assigned to the Planning Coordinator) will be lead to an improvement in reliability when compared to the standards it proposes to replace? 1 Yes 0 No</p>
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard’s emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. Regarding comments 2 through 7 please refer to the response provided in the formal comment form.</p>				
1	Seattle City Light	Pawel Krupa	Negative	<p>The scope of the standard is unclear because it does not specify which entities, lines or paths it applies to. Further, Seattle believes this standard should specifically apply to a Planning Authority required by its Regional Reliability Organization to establish interregional and intra-regional Transfer Capabilities, and thus is duplicative of other existing NERC standards.</p>
<p><b>Response:</b> The purpose of standard is to require Planning Coordinators to have a method for analysis of the ability to transfer energy (beyond 13 months) to identify potential future weaknesses and limiting facilities. The standard allows each Planning Coordinator to determine the method (transfer level, paths, contingencies,...) that best allows them to identify potential future weaknesses and limiting facilities according to their understanding of the needs of the system.</p> <p>The commission stated in Order 693 paragraph 790 “The Commission does not believe that the regional reliability organization should be able to decide the type of entity to which this Reliability Standard applies. ...” and the SDT agrees.</p>				

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The SDT believes there is a reliability related need for the transfer capability assessment to be conducted. The SDT does not believe the TPL standards adequately cover the need at this time.				
1	Tri-State G & T Association, Inc.	Keith V. Carman	Negative	Tri-State does not agree with the requirement to recalculate PTC values for all paths. A notation of changing values is sufficient.
<b>Response:</b> The purpose of standard is to require Planning Coordinators to have a method for analysis of the ability to transfer energy (beyond 13 months) to identify potential future weaknesses and limiting facilities. The standard allows each Planning Coordinator to determine the method (transfer level, paths, contingencies,...) that best allows them to identify potential future weaknesses and limiting facilities according to their understanding of the needs of the system. The revised standard does not require calculation of any PTC values.				
3	Tri-State G & T Association, Inc.	Janelle Marriott	Negative	We do not agree with the requirement to recalculate PTC values for all paths. A notation of changing values is sufficient
<b>Response:</b> The purpose of standard is to require Planning Coordinators to have a method for analysis of the ability to transfer energy (beyond 13 months) to identify potential future weaknesses and limiting facilities. The standard allows each Planning Coordinator to determine the method (transfer level, paths, contingencies,...) that best allows them to identify potential future weaknesses and limiting facilities according to their understanding of the needs of the system. The revised standard does not require calculation of any PTC values.				
2	Electric Reliability Council of Texas, Inc.	Chuck B Manning	Negative	ERCOT ISO has joined in the submission of the IRC SRC comments and submitted independent comments through the online survey. Please see online survey submissions for details.
<b>Response:</b> Thank you				
3	APS	Steven Norris	Negative	R1.4 requires that assumptions and criteria to calculate PTCs be as, or more limiting than the assumptions and criteria used in operating horizon. This is a vague requirement. The standard needs to provide specific guidelines on how to achieve this or R1.4 should be removed.
<b>Response:</b> The statement has been revised to require (under new Requirement R1 Part 1.3) that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices because the purpose of the standard is to support planning for reliable system operation in the planning horizon.				
5	Avista Corp.	Edward F. Groce	Negative	Requirement R1.4 disregards the differences between planning and operations. R1.4 requires that the Methodology Document" includes: "A statement that the assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon." Since operating assumptions represent short term current operating conditions (such as planned short term outages and low hydro), it is not reasonable to have a requirement that "assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon".

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<p><b>Response:</b> The statement has been revised to require (under new Requirement R1 Part 1.3) that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices because the purpose of the standard is to support planning for reliable system operation in the planning horizon.</p>				
5	MidAmerican Energy Co.	Christopher Schneider	Negative	<p>MidAmerican supports the Midwest Independent System Operator and Midwest Reliability Organization NERC Standards Review Subcommittee positions that several issues in this proposed standard need to be addressed. While MidAmerican understands the need to ensure that entities do not discourage transmission schedules through different assumptions in planning and operation horizons, the fundamental issue with the proposed Planning Transfer Capability Methodology standard is that it continues to confuse operational and planning case assumptions in R1.1 (last bullet) and R1.4. Both items should be deleted. Fundamentally a future planning case is a prediction and model of reality which inherently assumes conditions that may or may not be more limiting when reality and the actual operating horizon is reached.</p>
<p><b>Response:</b> The concept of transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The SDT has extensively revised Requirement R1 based on industry stakeholders' comments.</p>				