

A. **Introduction**

1. **Title:** Available Transmission System Capability
2. **Number:** MOD-001-1a
3. **Purpose:** To ensure that calculations are performed by Transmission Service Providers to maintain awareness of available transmission system capability and future flows on their own systems as well as those of their neighbors
4. **Applicability:**
 - 4.1. Transmission Service Provider.
 - 4.2. Transmission Operator.
5. **Proposed Effective Date:** Immediately after approval of applicable regulatory authorities.

B. **Requirements**

- R1.** Each Transmission Operator shall select one of the methodologies¹ listed below for calculating Available Transfer Capability (ATC) or Available Flowgate Capability (AFC) for each ATC Path per time period identified in R2 for those Facilities within its Transmission operating area: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
 - The Area Interchange Methodology, as described in MOD-028
 - The Rated System Path Methodology, as described in MOD-029
 - The Flowgate Methodology, as described in MOD-030
- R2.** Each Transmission Service Provider shall calculate ATC or AFC values as listed below using the methodology or methodologies selected by its Transmission Operator(s): [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
 - R2.1.** Hourly values for at least the next 48 hours.
 - R2.2.** Daily values for at least the next 31 calendar days.
 - R2.3.** Monthly values for at least the next 12 months (months 2-13).
- R3.** Each Transmission Service Provider shall prepare and keep current an Available Transfer Capability Implementation Document (ATCID) that includes, at a minimum, the following information: [*Violation Risk Factor: Lower*] [*Time Horizon: Operations Planning*]
 - R3.1.** Information describing how the selected methodology (or methodologies) has been implemented, in such detail that, given the same information used by the Transmission Service Provider, the results of the ATC or AFC calculations can be validated.
 - R3.2.** A description of the manner in which the Transmission Service Provider will account for counterflows including:

¹ All ATC Paths do not have to use the same methodology and no particular ATC Path must use the same methodology for all time periods.

- R4.5.** Each Reliability Coordinator adjacent to the Transmission Service Provider’s area.
- R4.6.** Each Transmission Service Provider whose area is adjacent to the Transmission Service Provider’s area.
- R5.** The Transmission Service Provider shall make available the current ATCID to all of the entities specified in R4. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- R6.** When calculating Total Transfer Capability (TTC) or Total Flowgate Capability (TFC) the Transmission Operator shall use assumptions no more limiting than those used in the planning of operations for the corresponding time period studied, providing such planning of operations has been performed for that time period. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- R7.** When calculating ATC or AFC the Transmission Service Provider shall use assumptions no more limiting than those used in the planning of operations for the corresponding time period studied, providing such planning of operations has been performed for that time period. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- R8.** Each Transmission Service Provider that calculates ATC shall recalculate ATC at a minimum on the following frequency, unless none of the calculated values identified in the ATC equation have changed: *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- R8.1.** Hourly values, once per hour. Transmission Service Providers are allowed up to 175 hours per calendar year during which calculations are not required to be performed, despite a change in a calculated value identified in the ATC equation.
- R8.2.** Daily values, once per day.
- R8.3.** Monthly values, once per week.
- R9.** Within thirty calendar days of receiving a request by any Transmission Service Provider, Planning Coordinator, Reliability Coordinator, or Transmission Operator for data from the list below solely for use in the requestor’s ATC or AFC calculations, each Transmission Service Provider receiving said request shall begin to make the requested data available to the requestor, subject to the conditions specified in R9.1 and R9.2: *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- Expected generation and Transmission outages, additions, and retirements.
 - Load forecasts.
 - Unit commitments and order of dispatch, to include all designated network resources and other resources that are committed or have the legal obligation to run, as they are expected to run, in one of the following formats chosen by the data provider:

Note that the North American Energy Standards Board (NAESB) is developing the companion standards that address the posting of ATC information, including supporting information such as that described in R9.

- Dispatch Order
- Participation Factors
- Block Dispatch
- Aggregated firm capacity set-aside for Network Integration Transmission Service and aggregated non-firm capacity set aside for Network Integration Transmission Service (i.e. Secondary Service).
- Firm and non-firm Transmission reservations.
- Aggregated capacity set-aside for Grandfathered obligations
- Firm roll-over rights.
- Any firm and non-firm adjustments applied by the Transmission Service Provider to reflect parallel path impacts.
- Power flow models and underlying assumptions.
- Contingencies, provided in one or more of the following formats:
 - A list of Elements
 - A list of Flowgates
 - A set of selection criteria that can be applied to the Transmission model used by the Transmission Operator and/or Transmission Service Provider
- Facility Ratings.
- Any other services that impact Existing Transmission Commitments (ETCs).
- Values of Capacity Benefit Margin (CBM) and Transmission Reliability Margin (TRM) for all ATC Paths or Flowgates.
- Values of Total Flowgate Capability (TFC) and AFC for any Flowgates considered by the Transmission Service Provider receiving the request when selling Transmission service.
- Values of TTC and ATC for all ATC Paths for those Transmission Service Providers receiving the request that do not consider Flowgates when selling Transmission Service.
- Source and sink identification and mapping to the model.

R9.1. The Transmission Service Provider shall make its own current data available, in the format maintained by the Transmission Service Provider, for up to 13 months into the future (subject to confidentiality and security requirements).

R9.1.1. If the Transmission Service Provider uses the data requested in its transfer or Flowgate capability calculations, it shall make the data used available

R9.1.2. If the Transmission Service Provider does not use the data requested in its transfer or Flowgate capability calculations, but maintains that data, it shall make that data available

R9.1.3. If the Transmission Service Provider does not use the data requested in its transfer or Flowgate capability calculations, and does not maintain that data, it shall not be required to make that data available

R9.2. This data shall be made available by the Transmission Provider on the schedule specified by the requestor (but no more frequently than once per hour, unless mutually agreed to by the requester and the provider).

C. Measures

M1. The Transmission Operator shall provide evidence (such as a calculation, inclusion of the information in the ATCID, or other written documentation) that it has selected one of the specified methodologies per time period in R2 for use in determining Transfer Capabilities of those Facilities for each ATC Path within the Transmission Operator's operating area. (R1).

M2. The Transmission Service Provider shall provide ATC or AFC values and identification of the selected methodologies along with other evidence (such as written documentation, processes, or data) to show it calculated ATC or AFC for the following using the selected methodology or methodologies chosen as part of R1 (R2):

- There has been at least 48 hours of hourly values calculated at all times. (R2.1)
- There has been at least 31 consecutive calendar days of daily values calculated at all times. (R2.2)
- There has been at least the next 12 months of monthly values calculated at all times (Months 2-13). (R2.3)

M3. The Transmission Service Provider shall provide its current ATCID that contains all the information specified in R3. (R3)

M4. The Transmission Service Provider shall provide evidence (such as dated electronic mail messages, mail receipts, or voice recordings) that it has notified the entities specified in R4 before a new or revised ATCID was implemented. (R4)

M5. The Transmission Service Provider shall provide evidence (such as a demonstration) that the current ATCID is available to all of the entities specified in R4, as required by R5. (R5)

M6. The Transmission Operator shall provide a copy of the assumptions (such as contingencies, loop flow, generation re-dispatch, switching operating guides or data sources for load forecast and facility outages) used to calculate TTC or TFC as well as other evidence (such as copies of operations planning studies, models, supporting information, or data) to show that the assumptions used in determining TTC or TFC are no more limiting than those used in planning of operations for the corresponding time period studied. Alternatively the Transmission Operator may demonstrate that the same load flow cases are used for both TTC or TFC and Operations Planning.

When different inputs to the calculations are used because the calculations are performed at different times, such that the most recent information is used in any calculation, a difference in that input data shall not be considered to be a difference in assumptions. (R6)

- M7.** The Transmission Service Provider shall provide a copy of the assumptions (such as contingencies, loop flow, generation re-dispatch, switching operating guides or data sources for load forecast and facility outages) used to calculate ATC or AFC as well as other evidence (such as copies of operations planning studies, models, supporting information, or data) to show that the assumptions used in determining ATC or AFC are no more limiting than those used in planning of operations for the corresponding time period studied. Alternatively the Transmission Service Provider may demonstrate that the same load flow cases are used for both AFC and Operations Planning. When different inputs to the calculations are used because the calculations are performed at different times, such that the most recent information is used in any calculation, a difference in that input data shall not be considered to be a difference in assumptions. (R7)
- M8.** The Transmission Service Provider calculating ATC shall provide evidence (such as logs or data) that it has calculated the hourly, daily, and monthly values on at least the minimum frequencies specified in R8 or provide evidence (such as data, procedures, or software documentation) that the calculated values identified in the ATC equation have not changed. (R8)
- M9.** The Transmission Service Provider shall provide a copy of the dated request, if any, for ATC or AFC data as well as evidence to show it responded to that request (such as logs or data) within thirty calendar days of receiving the request, and the requested data items were made available in accordance with R9. (R9)

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Enforcement Authority

Regional Entity.

1.2. Compliance Monitoring Period and Reset Time Frame

Not applicable.

1.3. Data Retention

The Transmission Operator and Transmission Service Provider shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- The Transmission Operator shall maintain its current selected method(s) for calculating ATC or AFC and any methods in force since last compliance audit period to show compliance with R1.

- The Transmission Service Provider shall maintain evidence to show compliance with R2, R4, R6, R7, and R8 for the most recent calendar year plus the current year.
- The Transmission Service Provider shall maintain its current, in force ATCID and any prior versions of the ATCID that were in force since the last compliance audit to show compliance with R3.
- The Transmission Service Provider shall maintain evidence to show compliance with R5 for the most recent three calendar years plus the current year.
- The Transmission Operator shall maintain evidence to show compliance with R6 for the most recent calendar year plus the current year.
- If a Transmission Service Provider or Transmission Operator is found non-compliant, it shall keep information related to the non-compliance until found compliant.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

1.4. Compliance Monitoring and Enforcement Processes:

The following processes may be used:

- Compliance Audits
- Self-Certifications
- Spot Checking
- Compliance Violation Investigations
- Self-Reporting
- Complaints

1.5. Additional Compliance Information

None.

2. Violation Severity Levels

R #	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	N/A	N/A	N/A	The Transmission Operator did not select one of the specified methodologies for each ATC Path per time period identified in R2 for those Facilities within its Transmission operating area.
R2.	<p>One or more of the following:</p> <ul style="list-style-type: none"> ▪ The Transmission Service Provider has calculated hourly ATC or AFC values for more than the next 30 hours but less than the next 48 hours. ▪ Has calculated daily ATC or AFC values for more than the next 21 calendar days but less than the next 31 calendar days. ▪ Has calculated monthly ATC or AFC values for more than the next 9 months but less than the next 12 months. 	<p>One or more of the following:</p> <ul style="list-style-type: none"> ▪ The Transmission Service Provider has calculated hourly ATC or AFC values for more than the next 20 hours but less than the next 31 hours. ▪ Has calculated daily ATC or AFC values for more than the next 14 calendar days but less than the next 22 calendar days. ▪ Has calculated monthly ATC or AFC values for more than the next 6 months but less than the next 10 months. 	<p>One or more of the following:</p> <ul style="list-style-type: none"> ▪ The Transmission Service Provider has calculated hourly ATC or AFC values for more than the next 10 hours but less than the next 21 hours. ▪ Has calculated daily ATC or AFC values for more than the next 7 calendar days but less than the next 15 calendar days. ▪ Has calculated monthly ATC or AFC values for more than the next 3 months but less than the next 7 months. 	<p>One or more of the following:</p> <ul style="list-style-type: none"> ▪ The Transmission Service Provider has calculated hourly ATC or AFC values for less than the next 11 hours. ▪ Has calculated daily ATC or AFC values for less than the next 8 calendar days. ▪ Has calculated monthly ATC or AFC values for less than the next 4 months. ▪ Did not use the selected methodology(ies) to calculate ATC.
R3.	The Transmission Service Provider has an ATCID that does not incorporate changes made up to three months ago.	The Transmission Service Provider has an ATCID that does not incorporate changes made more than three months but not more than six months ago.	<p>The Transmission Service Provider has an ATCID that does not incorporate changes made more than six months but not more than one year ago.</p> <p>OR</p> <p>The Transmission Service Provider has an ATCID, but it does not include one or two of the information items described in R3.</p>	<p>The Transmission Service Provider has an ATCID that does not incorporate changes made a year or more ago.</p> <p>OR</p> <p>The Transmission Service Provider does not have an ATCID, or its ATCID does not include three or more of the information items described in R3.</p>

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R #	Lower VSL	Moderate VSL	High VSL	Severe VSL
R4.	The Transmission Service Provider notified one or more of the parties specified in R4 of a new or modified ATCID after, but not more than 30 calendar days after, its implementation.	The Transmission Service Provider notified one or more of the parties specified in R4 of a new or modified ATCID more than 30, but not more than 60, calendar days after its implementation.	The Transmission Service Provider notified one or more of the parties specified in R4 of a new or modified ATCID more than 60, but not more than 90, calendar days after its implementation.	The Transmission Service Provider notified one or more of the parties specified in R4 of a new or modified ATCID more than 90 calendar days after its implementation. OR The Transmission Service Provider did not notify one or more of the parties specified in R4 of a new or modified ATCID for more than 90 calendar days after its implementation.
R5.	N/A	N/A	N/A	The Transmission Service Provider did not make the ATCID available to the parties described in R4.
R6.	The Transmission Operator determined TTC or TFC using assumptions more limiting than those used in planning of operations for the studied time period for more than zero ATC Paths or Flowgates, but not more than 5% of all ATC Paths or Flowgates or 1 ATC Path or Flowgate (whichever is greater).	The Transmission Operator determined TTC or TFC using assumptions more limiting than those used in planning of operations for the studied time period for more than 5% of all ATC Paths or Flowgates or 1 ATC Path or Flowgate (whichever is greater), but not more than 10% of all ATC Paths or Flowgates or 2 ATC Paths or Flowgates (whichever is greater).	The Transmission Operator determined TTC or TFC using assumptions more limiting than those used in planning of operations for the studied time period for more than 10% of all ATC Paths or Flowgates or 2 ATC Path or Flowgate (whichever is greater), but not more than 15% of all ATC Paths or Flowgates or 3 ATC Paths or Flowgates (whichever is greater).	The Transmission Operator determined TTC or TFC using assumptions more limiting than those used in planning of operations for the studied time period for more than 15% of all ATC Paths or Flowgates or more than 3 ATC Paths or Flowgates (whichever is greater).
R7	The Transmission Service Provider determined ATC or AFC using assumptions more limiting than those used in planning of operations for the studied time period for more than zero ATC Paths or Flowgates, but not more	The Transmission Service Provider determined ATC or AFC using assumptions more limiting than those used in planning of operations for the studied time period for more than 5% of all ATC Paths or Flowgates or 1 ATC Path	The Transmission Service Provider determined ATC or AFC using assumptions more limiting than those used in planning of operations for the studied time period for more than 10%, of all ATC Paths or Flowgates or 2 ATC	The Transmission Service Provider determined ATC or AFC using assumptions more limiting than those used in planning of operations for the studied time period for more than 15% of all ATC Paths or Flowgates or more

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R #	Lower VSL	Moderate VSL	High VSL	Severe VSL
	than 5% of all ATC Paths or Flowgates or 1 ATC Path or Flowgate (whichever is greater).	or Flowgate (whichever is greater), but not more than 10% of all ATC Paths or Flowgates or 2 ATC Paths or Flowgates (whichever is greater).	Path or Flowgate (whichever is greater), but not more than 15% of all ATC Paths or Flowgates or 3 ATC Paths or Flowgates (whichever is greater).	than 3 ATC Paths or Flowgates (whichever is greater).
R8.	<p>One or more of the following:</p> <ul style="list-style-type: none"> ▪ For Hourly, the values described in the ATC equation changed and the Transmission Service provider did not calculate for one or more hours but not more than 15 hours, and was in excess of the 175-hour per year requirement. ▪ For Daily, the values described in the ATC equation changed and the Transmission Service provider did not calculate for one or more calendar days but not more than 3 calendar days. ▪ For Monthly, the values described in the ATC equation changed and the Transmission Service provider did not calculate for seven or more calendar days, but less than 14 calendar days. 	<p>One or more of the following:</p> <ul style="list-style-type: none"> ▪ For Hourly, the values described in the ATC equation changed and the Transmission Service provider did not calculate for more than 15 hours but not more than 20 hours, and was in excess of the 175-hour per year requirement. ▪ For Daily, the values described in the ATC equation changed and the Transmission Service provider did not calculate for more than 3 calendar days but not more than 4 calendar days. ▪ For Monthly, the values described in the ATC equation changed and the Transmission Service provider did not calculate for 14 or more calendar days, but less than 21 calendar days. 	<p>One or more of the following:</p> <ul style="list-style-type: none"> ▪ For Hourly, the values described in the ATC equation changed and the Transmission Service provider did not calculate for more than 20 hours but not more than 25 hours, and was in excess of the 175-hour per year requirement. <p>For Daily, the values described in the ATC equation changed and the Transmission Service provider did not calculate for more than 4 calendar days but not more than 5 calendar days.</p> <ul style="list-style-type: none"> ▪ For Monthly, the values described in the ATC equation changed and the Transmission Service provider did not calculate for 21 or more calendar days, but less than 28 calendar days. 	<p>One or more of the following:</p> <ul style="list-style-type: none"> ▪ For Hourly, the values described in the ATC equation changed and the Transmission Service provider did not calculate for more than 25 hours, and was in excess of the 175-hour per year requirement. ▪ For Daily, the values described in the ATC equation changed and the Transmission Service provider did not calculate for more than 5 calendar days. ▪ For Monthly, the values described in the ATC equation changed and the Transmission Service provider did not calculate for 28 or more calendar days.

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R #	Lower VSL	Moderate VSL	High VSL	Severe VSL
R9	N/A	<p>The Transmission Service Provider made the requested data items specified in R9 available to the requesting entities specified within the requirement, per the schedule specified in the request, subject to the limitations specified in R9, available more than 30 calendar days but less than 45 calendar days after receiving a request.</p>	<p>The Transmission Service Provider made the requested data items specified in R9 available to the requesting entities specified within the requirement, per the schedule specified in the request, subject to the limitations specified in R9, available 45 calendar days or more but less than 60 calendar days after receiving a request.</p>	<p>The Transmission Service Provider did not make the requested data items specified in R9 available to the requesting entities specified within the requirement, per the schedule specified in the request, subject to the limitations specified in R9, available for 60 calendar days or more after receiving a request.</p>

Version History

Version	Date	Action	Change Tracking
1	8/26/2008	Adopted by the Board of Trustees	
1a	Board approved 11/05/2009	Interpretation of R2 and R8	Interpretation (Project 2009-15)

Appendix 1

Requirement Number and Text of Requirement
<p>MOD-001-01 Requirement R2:</p> <p>R2. Each Transmission Service Provider shall calculate ATC or AFC values as listed below using the methodology or methodologies selected by its Transmission Operator(s):</p> <ul style="list-style-type: none"> R2.1. Hourly values for at least the next 48 hours. R2.2. Daily values for at least the next 31 calendar days. R2.3. Monthly values for at least the next 12 months (months 2-13). <p>MOD-001-01 Requirement R8:</p> <p>R8. Each Transmission Service Provider that calculates ATC shall recalculate ATC at a minimum on the following frequency, unless none of the calculated values identified in the ATC equation have changed:</p> <ul style="list-style-type: none"> R8.1. Hourly values, once per hour. Transmission Service Providers are allowed up to 175 hours per calendar year during which calculations are not required to be performed, despite a change in a calculated value identified in the ATC equation. R8.2. Daily values, once per day. R8.3. Monthly values, once per week.
Question #1
<p>Is the “advisory ATC” used under the NYISO tariff subject to the ATC calculation and recalculation requirements in MOD-001-1 Requirements R2 and R8? If not, is it necessary to document the frequency of “advisory” calculations in the responsible entity’s Available Transfer Capability Implementation Document?</p>
Response to Question #1
<p>Requirements R2 and R8 of MOD-001-1 are both related to Requirement R1, which defines that ATC methodologies are to be applied to specific “ATC Paths.” The NERC definition of ATC Path is “Any combination of Point of Receipt and Point of Delivery for which ATC is calculated; and any Posted Path.” Based on a review of the language included in this request, the NYISO Open Access Transmission Tariff, and other information posted on the NYISO Web site, it appears that the NYISO does indeed have multiple ATC Paths, which are subject to the calculation and recalculation requirements in Requirements R2 and R8. It appears from reviewing this information that ATC is defined in the NYISO tariff in the same manner in which NERC defines it, making it difficult to conclude that NYISO’s “advisory ATC” is not the same as ATC. In addition, it appears that pre-scheduling is permitted on certain external paths, making the calculation of ATC prior to day ahead necessary on those paths.</p> <p>The second part of NYISO’s question is only applicable if the first part was answered in the</p>

negative and therefore will not be addressed.

Requirement Number and Text of Requirement

MOD-029-01 Requirements R5 and R6:

R5. When calculating ETC for firm Existing Transmission Commitments (ETC_F) for a specified period for an ATC Path, the Transmission Service Provider shall use the algorithm below:

$$ETC_F = NL_F + NITS_F + GF_F + PTP_F + ROR_F + OS_F$$

Where:

NL_F is the firm capacity set aside to serve peak Native Load forecast commitments for the time period being calculated, to include losses, and Native Load growth, not otherwise included in Transmission Reliability Margin or Capacity Benefit Margin.

$NITS_F$ is the firm capacity reserved for Network Integration Transmission Service serving Load, to include losses, and Load growth, not otherwise included in Transmission Reliability Margin or Capacity Benefit Margin.

GF_F is the firm capacity set aside for grandfathered Transmission Service and contracts for energy and/or Transmission Service, where executed prior to the effective date of a Transmission Service Provider’s Open Access Transmission Tariff or “safe harbor tariff.”

PTP_F is the firm capacity reserved for confirmed Point-to-Point Transmission Service.

ROR_F is the firm capacity reserved for Roll-over rights for contracts granting Transmission Customers the right of first refusal to take or continue to take Transmission Service when the Transmission Customer’s Transmission Service contract expires or is eligible for renewal.

OS_F is the firm capacity reserved for any other service(s), contract(s), or agreement(s) not specified above using Firm Transmission Service as specified in the ATCID.

R6. When calculating ETC for non-firm Existing Transmission Commitments (ETC_{NF}) for all time horizons for an ATC Path the Transmission Service Provider shall use the following algorithm:

$$ETC_{NF} = NITS_{NF} + GF_{NF} + PTP_{NF} + OS_{NF}$$

Where:

$NITS_{NF}$ is the non-firm capacity set aside for Network Integration Transmission Service serving Load (i.e., secondary service), to include losses, and load growth not otherwise included in Transmission Reliability Margin or Capacity Benefit Margin.

GF_{NF} is the non-firm capacity set aside for grandfathered Transmission Service and contracts for energy and/or Transmission Service, where executed prior to the

effective date of a Transmission Service Provider's Open Access Transmission Tariff or "safe harbor tariff."

PTP_{NF} is non-firm capacity reserved for confirmed Point-to-Point Transmission Service.

OS_{NF} is the non-firm capacity reserved for any other service(s), contract(s), or agreement(s) not specified above using non-firm transmission service as specified in the ATCID.

Question #2

Could OS_F in MOD-029-1 Requirement R5 and OS_{NF} in MOD-029-1 Requirement R6 be calculated using Transmission Flow Utilization in the determination of ATC?

Response to Question #2

This request for interpretation and the NYISO Open Access Transmission Tariff describe the NYISO's concept of "Transmission Flow Utilization;" however, it is unclear whether or not Native Load, Point-to-Point Transmission Service, Network Integration Transmission Service, or any of the other components explicitly defined in Requirements R5 and R6 are incorporated into "Transmission Flow Utilization." Provided that "Transmission Flow Utilization" does not include Native Load, Point-to-Point Transmission Service, Network Integration Transmission Service, or any of the other components explicitly defined in Requirements R5 and R6, it is appropriate to be included within the "Other Services" term. However, if "Transmission Flow Utilization" does incorporate those components, then simply including "Transmission Flow Utilization" in "Other Service" would be inappropriate.