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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☒ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs and ISOs
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	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: APPA

Lead Contact: **E. Nick Henery**

Contact Organization: **APPA**

Contact Segment: **Segment 1**

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Contact E-mail: **nhenery@APPAnet.org**

Additional Member Name	Additional Member Organization	Region*	Segment*
Matt Schull	North Carolina Municipal Power Agency #1	**SERC**	Segment 5 - Electric Generators

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

Project 2006-07 was initiated in 2006 to revise the then existing NERC reliability modeling standards to ensure the consistent and transparent calculation, verification, preservation, and use of Total Transfer/Flowgate Capability (TTC)/(TFC) and Available Transfer/Flowgate Capability (ATC)/(AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/TFC and ATC/AFC calculations and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/TFC and ATC/AFC. Such changes will enhance the reliable use of the bulk power transmission system without arbitrarily limiting commercial activity.

On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: The MOD-001 Standard incorrectly assigns duties to the Transmission Service Provider (TSP). The duties of the TSP, according to the Functional Model, do not include the determination of a method of calculating the ATC. The three methods suggested in MOD-028 through 030 will be determined as detailed in the Functional Model by the reliability Functions; Planning Authority, Transmission Operator, or Reliability Coordinator; depending on the time horizon of the Studies.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☒ No

   Comments: The Federal Energy Regulatory Commission (FERC) has requested Standards that determine the requirements to calculate TTC will be handled in the FAC Standards. Order 693 States the following: 1050. We adopt the NOPR proposal and require that TTC be addressed under the Reliability Standard that deals with transfer capability such as FAC-012-1, rather than MOD-001-0. The FAC series of standards contain the Reliability Standards that form the technical and procedural basis for calculating transfer capabilities. FAC-008-1 provides the basis for determining the thermal ratings of facilities while FAC-009-1 provides the basis for communicating those ratings. FAC-010-1 and FAC-011-1 provide the system operating limits methodologies for the planning and operational horizon respectively and FAC-014 provides for the communication of those ratings.
   FERC has correctly recognized that FAC-012 and FAC-013, while associated with modeling is highly dependent on the previous FAC Standards as noted by FERC.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: MOD-001 if written correctly will detail has the Transmission Service Provider will: 1) acquire the necessary data to calculculate the ATC; 2) the frequency of calculation; 3) the posting of values of the ATC, ATC formula components, and the assumptions use to obtain the

values of the the ATC formula components. ---- The other Applicable Functions will be in supporting Standards for TTC/TFC, CBM, TRM, and ETC.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

☐ Yes

☒ No

Comments: The Requirement 5 should set the Maximum amount of time between calculations. The way it is written is that the Requirement sets a Minimum amount of time between calculations. What if an entity updated the Daily before the 24 hours was up; they would be non-compliant. In addition, since hourly covers the next 168 hours, Daily or Weekly calculations will be overlaping each other, one should be omitted. Note TVA's posted method, while they mention Daily and Weekly, they only post Daily for 30 days.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☐ Yes

☒ No

Comments: Available Transfer Capability Implementation Document (ATCID) is redundant should not be made a requirement of the TSP. The ATC is just the algebraic sum of the four components; TTC, ETC, CBM, and TRM. What ever method is used to calculate the TTC, i.e. Flow Gate, Rated System Path, or Network is determined by the planners; RC or TOP and the assumptions will accompany the TTC/TFC values and be posted. The complete description of the ATC calculation is contained in the assumptions of the other components, CBM, TRM, and ETC, which will be posted on the OASIS or other electronic means.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments: The posting that are listed are for TTC, the SDT needs to address the assumptions for the other components.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: What is meant by "evaluation of the transmission service request?" If "evaluation of the transmission service request" is prioritizing the transmission service requests base on a predetermined set of rules, the answer is no. Rules to prioritize transmission service requests are based upon negotiated or regulated terms that are a business decision, not reliability.mean by the evaluation of transmission requests? Evaluation of the transmission service request for reliability issues will be made by TOPs or BAs.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☒ Yes

☐ No

Comments: Requirements within this proposed standard deal with the assumptions that will be required by those functions that determine TTC.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: The Standard is written much like a Policy and it cannot be determined who is responsible for the different calculations of the components of the ATC. The Standard does not provide the Compliance Monitor or the TSP who calculates the Hourly. Daily, and Monthly ATCs with the necessary requirements to know what is necessary to be compliant. A copy of a Draft MOD-001 that has been written in a Standard Format that will permit the Compliance Monitor and the Applicable Functions to respond to measureable requirements is attached for the SDT review and comments.

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The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: ATC related standards should be applicable only to entities who have the obligation to provide non-discrimintory transmission service, that is the Transmission Service Providers.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: The calculation frequency is a business practice and should not be part of NERC standards.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: Evaluation of Transmission Service Requests is a tariff and business issue not a reliability issue.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

A.

The horizons described in R2 are not consistent with FAC-010 and FAC-011, which describe the operating horizon and up to one year. These terms are not capitalized and defined anywhere, so I am not going to say that MOD is incorrect. there is a potential for confusion and iscommunications between the planners and the Transmission Service Providers.

B

The requirement "subject to security and confidentiality requirements" in R6 is in conflict with FERC's Standards of Conduct. The TSPs may not provide transmission information discriminatorily.

C

R6.9 is unclear.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments: However, please clarify that "one standard" is MOD-001.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: "Planning Coordinator" is not defined in the NERC Glossary of Terms Used in Reliability Standards. Please clarify what the Planning Coordinator is or replace "Planning Coordinator" with Planning Authority.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: The minimum calculation requirements should mandate recalculation during regular business hours, as opposed to every day at midnight. We suggest leaving the final determination of the proper time for ATC/AFC calculation updates to NAESB, as this is a business practice issue.
   Additionally, R5.5. should be added to address the calculation frequency for annual ATC/AFC values.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☐ Yes

☒ No

Comments: R3.1. should read "… the results of the ATC/AFC calculations may be validated." R3.6. should be added to clarify that the ATCID must only include information pertaining to Posted Paths or Flowgates, where "Posted Path" is defined consistent with NAESB R-4005 and Order 889, RM95-9-000, April 24, 1996, P. 58-60.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments: Except that R6.8. should read "ATC/AFC recalculation frequency and times."

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: The evaluation of Transmission Service Requests (TSRs) is outside the scope of FERC's Order 890 directives and there is insufficient time left, prior to the scheduled September 18th posting of these standards for balloting, to draft adequate TSR evaluation standards and provide sufficient industry comment periods.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☐ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: The ATC MODs (MOD-001-1, MOD-028-1, MOD-029-1, and MOD-030-1) do not clearly distinguish the methodologies and their applications. Please provide narrative descriptions of these methodologies.

The horizons defined in R2.2. and R2.3. need to be reconciled with the Planning and Operating horizons previously defined by NERC.

R5. should be modified to the following:

"R5. Each Transmission Service Provider that calculates ATC for Posted Paths or AFC for Flowgates shall, at a minimum, recalculate those ATC/AFCs at the following frequency:

R5.1. For hourly ATC/AFC…

R5.2. For daily ATC/AFC…

R5.3. For weekly ATC/AFC…

R5.4. For monthly ATC/AFC…

R5.5. For yearly ATC/AFC…"

Definitions of the terms "Counter flow" and "Loop flow" are needed, to understand the distinction between the two.

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The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

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The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: Neither the standard nor the whitepaper provide enough background information to explain why the structure is necessary. Without the background information it is difficult to determine why this proposed structure is optimal.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: Specifically, R5.4: a minimum of "once a month" is not enough to facilitate commercial activities. Frequency should be "once a day" with a waiver if the inputs to the model have not changed "significantly" from the previous day. Also, what is the minimum frequency for yearly service?

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☐ Yes

☒ No

Comments: Need to include more details as to how transmission service request are modeled.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☐ Yes

☒ No

Comments: Need to include Transmission Customers as an entity.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☒ Yes

☐ No

Comments:

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☐ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: What determines which ATC calculation method a transmission service provider adapts or the frequency they can change?

In R4 please add Transmission Customers to the notification list.

In R6 please add Transmission Customers to the list that the transmission service provider will make the information available.

Also, please better define "subject to security and confidentiality requirements."

Please use this form to submit comments on the 2nd draft of standard MOD-001-1, Available Transfer Capability. Comments must be submitted by **June 24, 2007.** You may submit the completed form by e-mail to sarcomm@nerc.net with "ATC Standard" in the subject line. If you have questions please contact **Andy Rodriquez** at Andy.Rodriquez@nerc.net or by telephone at 609-947-3885.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Greg Rowland	
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E-mail:	gdrowlan@duke-energy.com	

NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☒	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☒ No

   Comments: FAC-012 should be modified to clearly state that the purpose is to provide instructions for calculating transfer capabilities used in regional reliability assessments. The methodologies used for calculating TTC and these transfer capabilities should be similar, but the assumptions will vary due to the different purposes of the calculations. The major difference is that transfer capabilities for use in reliability assessments are generally only calculated once or twice a year for peak season conditions and TTCs are generally calculated more frequently. Additionally, the transfer capabilities used in reliability assessments should use assumptions reflecting a "worst case" scenario, whereas the assumptions used for calculating TTC should reflect the best forecast of conditions for the particular time period the TTC is being calculated for.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: R5 should be modified to include yearly ATC.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☐ Yes

☒ No

Comments: Need to add another requirement that describes the manner in which the Transmission Service Provider will account for allocation of firm transmission capacity (i.e. reciprocal flowgate allocation).

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☐ Yes

☒ No

Comments: Should specify that the information to be made available is information used in calculation of ATC. Also, need to include flowgate allocation data, identifying any portion of flowgate(s) that have been allocated for firm transmission.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: NAESB should be responsible for business practice standards for evaluation of Transmission Service Requests. The only impact the evaluation of TSRs have on ATC calculations is addressed in MOD-028-1, MOD-029-1 and MOD-030-1.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

Please use this form to submit comments on the 2nd draft of standard MOD-001-1, Available Transfer Capability. Comments must be submitted by **June 24, 2007.** You may submit the completed form by e-mail to sarcomm@nerc.net with "ATC Standard" in the subject line. If you have questions please contact **Andy Rodriquez** at Andy.Rodriquez@nerc.net or by telephone at 609-947-3885.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Narinder K Saini	
Organization:	Entergy Services Inc.	
Telephone:	870-543-5420	
E-mail:	nsaini@entergy.com	

NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*
George Baretlett	Entergy Services Inc.	**SERC**	Transmission Owner
Jim Case	Entergy Services Inc.	**SERC**	Transmission Owner
Ed Davis	Entergy Services Inc.	**SERC**	Transmission Ownere

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

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The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments: Entergy supports this approach.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☐ No

   Comments: Yes, FAC-012 and FAC-013 can be retired after requirements for TTC/TFC methodologies are included in these standards.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: Calculation frequency should be linked with the change in elements of ATC that impact ATC. For example Monthly ATC should not be only calculated once a month, rather it should be recalculated when any reservation impacting the Monthly ATC is confirmed, this could be a Daily or Weekly reservation. If a reservation that impacts the Monthly reservation is confirmed on second day of the month, and Monthly ATCs are not recalculated till first day of the next month, the Monthly ATC values for the impacted period will remain inaccurate for the remaining entire month. Recalculation frequency should be included in NAESB business Practice Standard rather than in reliability standard.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☐ Yes

☒ No

Comments: R 3.5 requires to identify only TSPs from which data is received. In practice, TSP may receive data from entities other than TSP's such as PSEs, Generator Operators etc. for calculating transfer capability. Entergy suggests that TSP should identify all suppliers of data in ATCID for calculation of ATCs and not only other TSPs..

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☐ Yes

☒ No

Comments: It is not clear how other parties can demonstrate reliability need. In addition, in R6.9, it is not clear what is expected under Transmission Reservation impact modeling identification. If response factors are expected, it should be stated as such, or the term impact modeling identification be defined.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: Requirements of evaluation of Transmission Service Requests is not a reliability issue and it does not have to be included in NERC Realiability Standards. Once Transmission Service Request is confirmed, regardless of which evaluation process is used, it should be included in ETC as appropriate. If needed, Transmission Service Request evalulation process should be addressed by NAESB Business Practice Standards.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: Notification as required in R4 is not necessary if the ATCID is to be posted on a public site.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Steve Myers	
Organization:	ERCOT	
Telephone:	512-248-3077	
E-mail:	smyers@ercot.com	
NERC Region		**Registered Ballot Body Segment**
☒ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☒ No

   Comments: See IRC comments.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☒ No

   Comments: See IRC comments submitted by Charles Yeung.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: See IRC comments submitted by Charles Yeung.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☒ Yes

   ☒ No

   Comments: ERCOT does not perform these calculations since these concepts are not used within ERCOT. See IRC comments submitted by Charles Yeung.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: See IRC comments submitted by Charles Yeung.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

   ☒ Yes

   ☒ No

   Comments: See IRC comments submitted by Charles Yeung.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

   ☐ Yes

   ☒ No

   Comments: See IRC comments submitted by Charles Yeung.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

   ☒ Yes

   ☐ No

   Comments: ERCOT is a separate Interconnection and Region connected to the Eastern Interconnection through DC ties. Texas Senate Bill 7 effective on 9/1/99 amended the Texas utilities code to provide for the restructuring of the electric utility industry within the ERCOT region. The act deregulated the electricity generation market to allow for competition in the retail sale of electricity. As of July 2001 the ERCOT interconnection began operation as a single Balancing Authority and implemented a market in accordance with the Texas Public Utility commission ruling. Since the implementation of this Act, all of ERCOT has been a single Balancing Authority Area Interconnection and there has been no reservation of transmission capacity in ERCOT.

   Available Transfer Capability is defined as the measure of the transfer capability remaining in the physical transmission network for further commercial activity over and above already committed uses. It is defined as Total Transfer Capability less existing transmission commitments (including retail customer service), less a Capacity Benefit Margin, less a Transmission Reliability Margin. The ERCOT Interconnection has already moved "beyond" ATC and into a Market design which resulted in the disappearance of an explicit transmission service product. In addition the DC Tie transfer capability is planned and coordinated by a TSP that is a member of both Regions and therfore both ERCOT and SPP are notified when the DC Tie capability is reduced.

   Under ERCOT market rules, Transmission Service allows all eligible transmission service customers to deliver energy from resources to serve load obligations, using the transmission facilities of all of the Transmission Service Providers in ERCOT. Currently ERCOT employs a zonal congestion management scheme that is flow-based, whereby the ERCOT transmission grid, including attached generation resources and load, are divided into a predetermined number of congestion zones. This congestion management scheme applies zonal shift factors, determined by ERCOT, to predict potential congestion under the known topology of the ERCOT System. This scheme is used in the Day Ahead and Adjustment Periods to evaluate potential congestion. During the operating period ERCOT uses zonal shift factors to determine zonal Redispatch deployments needed to maintain flows within zonal limits. The local congestion management scheme relies on a more detailed Operational Model to determine how each particular Resource or Load impacts the transmission system. This model uses the current known topology of the transmission system. Unit specific Redispatch instructions are then issued to manage local congestion.

   In the future ERCOT will be transitioning from a Zonal Market to a full LMP market. This system is designed to manage congestion in the Day Ahead and Real-Time on a Resource specific

basis. Under both of these market designs transmission facility limits are established in advance and updated based on coordinated exchange of information between transmission providers and ERCOT in planning and operating periods.

In the current and future ERCOT market design the method of calculating ATC, TTC and the use of CBM and TRM are not applicable to the ERCOT Region. ERCOT does not have a synchronous connection with any other Balancing Authority Area, and does not use the transmission reservation and scheduling practices addressed by these standards. ERCOT requests the drafting team consider revising the wording so that Responsible Entitles required to conform to the standards are those that are synchronously connected with other Balancing Authority Areas and/or offer transmission reservations and schedules within the Interconnection. We also recommend that the standard allow for ERCOT exception or exemption from calculation and posting of ATC, TTC, CBM, and TRM without the need for a Regional variance.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: See IRC comments submitted by Charles Yeung.

Please use this form to submit comments on the 2nd draft of standard MOD-001-1, Available Transfer Capability. Comments must be submitted by **June 24, 2007.** You may submit the completed form by e-mail to sarcomm@nerc.net with "ATC Standard" in the subject line. If you have questions please contact **Andy Rodriquez** at Andy.Rodriquez@nerc.net or by telephone at 609-947-3885.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Dave Folk	
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*
Richard Kovacs	FirstEnergy Corp. EDPP		
Phil Bowers	FirstEnergy Corp. EDPP		

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

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On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: MOD-001, 028, 029, and 030 should be combined into one standard to eliminate the need to reference several standards at once and eliminate duplication.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☐ No

   Comments: FAC-012 and 013 are similar in scope to MOD-001 and should be retired once MOD-001 is revised.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☒ Yes

   ☐ No

   Comments: R5 should require recalculation of ATC as interchange schedules or transmission reservations change.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

Comments: R3 gives the TSP a lot of leeway in how it implements the calculations that it performs under this standard. R3.1 is not specific enough to meet the intent of 693-1057, additional detail on required elements is needed to insure that adequate data is exchanged to enable the duplication and verification of the calculations for validation..

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments: Overall R6 addresses data sharing beter than it does the uniformity of the data. R6 should specify the time periods and method (electronic?) for sharing the specified data. In addition, it should specify the time period of the data to be shared - future data, past data, or both. As written, R6 leaves too much leeway to meets the stated purpose of promoting the consistent and uniform application and documentation of ATC calculations. Lastly, R6 requires the sharing of data with other parties with a demonstrated reliability need, methods are needed for determining that a reliability need has been demonstrated, who will make this determination, and for resolving conflicts.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☒ Yes

☐ No

Comments: MOD-001 should include the Transmission Service Request evaluation rules necessary to maintain the relaibility of the Bulk Electric System.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: R1 requires agreement on methodology among TSP, PCs and RCs and should include a method for handling disagreements.

R2 implies need for incorporating schedules but does not imply or explicitly state the incorporation of transmission reservations.

R4.8 should require a written request as a means of formally documenting the request was made, received, and acknowledged.

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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*
Danielle Beaulieu	Hydro-Québec TransÉnergie	**NPCC**	1

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On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☒ No

   Comments: Are FAC-012 and FAC-013 intended to be for only interfaces where transmission service is sold? If not, and these standards are intended to cover the establishment of intra-area interfaces, then the retirement of these standards would be leaving a gap that is not covered by other standards.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: (1) Language needs to be clear that TSPs only have to calculate ATC for durations of service that they offer.
   (2) Regarding the frequency of the updates; it should be clear that if no inputs have changed that no recalculations are required. For example, for those entities that update ATC automatically based on receipt of service requests or a change in TTC, it would be burdensome to 'recalculate' on this stated frequency with no added value.
   (3) Regarding the timing of the updates; Suggest replace 'at' with 'no later than' so that the auditing aspect of this requirement is reasonable. Entities would be allowed to have calculated that data at any time prior to this required time point. Required timing of updates to be 'at' a

specific time creates an auditing trap. For example, how long does it take to perform a set of ATC calculations? Is this requiring that calculations be started at this time or completed by this time? Knowing when the calculations are completed will also provide a known time point for the posting requirements to be developed by NAESB.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☒ Yes

☐ No

Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: The evaluation of Transmission Service Requests is a Business Practice and should continue to be addressed under NAESB

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☒ Yes

☐ No

Comments: The current wording of Requirement 5 contains language that dictates precisely when ATC calculations must occur. There are areas with existing market rules and corresponding tariffs that dictate when publications of data occur (for example - after the clearing of a Day Ahead Market). NERC standards do not have the authority to require wholesale changes to existing market structures. Therefore, the wording of the timing of the required ATC calculations must be more general.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: For those entities that do not provide physical transmission service, some of the requirements in these stanards do not apply. With the current arrangement of these proposed standards, the ATCID for these entities would clearly document what requirements of the standards are or are not applicable.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

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1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☒ No

   Comments: We do not have a strong view one way or the other on splitting the former MOD-001 into various standards with some of them each addressing an ATC calculation methodology. However, we have some fundamental disagreements with some of the standards as drafted. Unfortunately, the SAR that proposed the split has not provided the scope and description of what went into the draft standards such as MOD-001, MOD-028, MOD-029 and MOD-030, which in our view should have been posted for review and comments before this and the other MOD standards are drafted.

   Specific to this draft standard, we have a number of concerns and comments which we will list below.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☒ No

   Comments: Owing to the various concerns we have over MOD-001, MOD-028 to MOD-030, we are unable to determine at this time whether or not FAC-012 and FAC-013 can or cannot be retired until we see the more refined versions of the MOD standards.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: The RC and PC do not have a role in MOD-001 as they are neither responsible for calculating ATC, nor are they responsible for implementing or agreeing to a method for use in calculating ATC.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

☒ Yes

☐ No

Comments: We generally agree.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☐ Yes

☒ No

Comments: We do not know what this Available Transfer Capability Implementation Document (ATCID) is intended to provide and serve. Is this a document that resembles or replaces the existing Regional ATC Methodology document? If so, there is much more information to be provided. For example, coordination with neighboring TSPs on ATC calculation, interface definitions, path names, etc.

Notwithstanding the above concerns, we do not understand why the RC and the PC need to be identified in R3.3 but not the TOP.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☒ No

Comments: Though it is not stated in the requirement, we assume these data are related to ATC calculation. Some of the data do not support reliability need (e.g. time and frequency of ATC calculation), while there may be some that do but not listed. There are also some data that are proprietray information for which consent of the information owner must be sought before they can be disseminated. But until we see a more refined set of standards that better align roles and responsibilities, we are unable to provide any specific inputs to the completeness and appropriateness of the list.

In R6.5 – By Transmission Reservations, does the requirement mean both "firm" and "non-firm" reservations?

In R6.6 – The requirement should state both power flow models and the underlying modeling assumptions including the modeling of generators in the first-tier control areas.

The list of single and multiple element contingencies included in the ATC calculation should also be provided.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: It'd be best to keep this standard to calculating ATC only. Evaluation of transmission service request belongs to another standard, or even a NAESB businesss practice.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments: Not aware of any conflicts but it should be pointed out that some entities do not provide physical transmission services. Hence, these standards or some of the requirements in these standards may not apply.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: Please see our high level comments to the SAR which we feel need to be addressed first before providing any comments specific to this standard.

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Group Comments (Complete this page if comments are from a group.)

Group Name: IRC Standards Review Committee

Lead Contact: **Charles Yeung**

Contact Organization: **SPP**

Contact Segment: **2**

Contact Telephone: **832-724-6142**

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Ron Falsetti	IESO	**NPCC**	2
Matt Goldberg	ISO-NE	**NPCC**	2
Brent Kingsford	CAISO	**WECC**	2
Steve Myers	ERCOT	**ERCOT**	2
Anita Lee	AESO	**WECC**	2
Bill Phillips	MISO	**RFC+**	2
		MRO+	
		SERC+	
		SPP	

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The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☒ No

   Comments: We do not have a strong view one way or the other on splitting the former MOD-001 into various standards with some of them each addressing an ATC calculation methodology. However, we have some fundamental disagreements with some of the standards as drafted. Unfortunately, the SAR that proposed the split has not provided the scope and description of what went into the draft standards such as MOD-001, MOD-028, MOD-029 and MOD-030, which in our view should have been posted for review and comments before this and the other MOD standards are drafted.

   Specific to this draft standard, we have a number of concerns and comments which we will list below.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☒ No

   Comments: Owing to the various concerns we have over MOD-001, MOD-028 to MOD-030, we are unable to determine at this time whether or not FAC-012 and FAC-013 can or cannot be retired until we see the more refined versions of the MOD standards.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: The RC and PC are not responsible for calculating ATC, nor are they responsible for implementing or agreeing to a method for use to calculate ATC. They do not have a role in MOD-001.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

☐ Yes

☒ No

Comments: The calculation frequency is not consistent across all methodologies. The frequency should allow for time to validate the values calculated. It may not be consistent with currently filed FERC Operating Agreements, which is not a minimum requirement for the whole industry.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☐ Yes

☒ No

Comments: We do not know what this Available Transfer Capability Implementation Document is intended to provide and serve. Is this a document that resembles or replaces the existing Regional ATC Methodology document? If so, there is much more information to be provided. For example, coordination with neighbor TSPs on ATC calculation, interface definitions, path names, etc.

Notwithstanding the above concerns, we do not understand why the RC and the PC need to be identified in R3.3 but not the TOP.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☒ No

Comments: Though it is not stated in the requirement, we assume these data are related to ATC calculation. Some of the data do not support reliability need (e.g. time and frequency of ATC calculation), while there may be some that do but not listed. There are also some data that are proprietray information for which consent of the information owner must be sought before they can be disseminated. But until we see a more refined set of standards that better align roles and responsibilities, we are unable to provide any specific inputs to the completeness and appropriateness of the list.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: It'd be best to keep this standard to calculating ATC only. Evaluation of transmission service request belongs to another standard, or even a NAESB businesss practice.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments: Not aware of any conflicts but it should be pointed out that some entities do not provide physical transmission services. Hence, these standards or some of the requirements in these stnadards may not apply.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: Please see our high level comments to the SAR which we feel need to be addressed first before providing any comments specific to this standard.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☒ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☒	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
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Group Comments (Complete this page if comments are from a group.)

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Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments: While the RC and the PC do not calculate ATC, they are responsible for calculating TTC which is a direct input to the ATC calculation. Since the selection of the TTC methodology will determine which ATC standard is utilized by the TSP, it is appropriate for the RC and the PC to be applicable entities in this standard. While it is not specifically stated in R1 and R2 that the RC and PC are involved solely because of their involvement in TTC, the MOD-028, MOD-029 and MOD-030 clearly deliniate the responsibility for those entities.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: (1) Language needs to be clear that TSPs only have to calculate ATC for durations of service that they offer.
   (2) Regarding the frequency of the updates; it should be clear that if no inputs have changed that no recalculations are required. For example, for those entities that update ATC automatically based on receipt of service requests or a change in TTC, it would be burdensome to 'recalculate' on this stated frequency with no added value.

(3) Regarding the timing of the updates; Suggest replace 'at' with 'no later than' so that the auditing aspect of this requirement is reasonable. Entities would be allowed to have calculated that data at any time prior to this required time point. Required timing of updates to be 'at' a specific time creates an auditing trap. For example, how long does it take to perform a set of ATC calculations? Is this requiring that calculations be started at this time or completed by this time? Knowing when the calculations are completed will also provide a known time point for the posting requirements to be developed by NAESB.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☒ Yes

☐ No

Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: The evaluation of Transmission Service Requests is a Business Practice and should continue to be addressed under NAESB

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☒ Yes

☐ No

Comments: The current wording of Requirement 5 contains language that dictates precisely when ATC calculations must occur. There are areas with existing market rules and corresponding tariffs that dictate when publications of data occur (for example - after the clearing of a Day Ahead Market). NERC standards do not have the authority to require wholesale changes to existing market structures. Therefore, the wording of the timing of the required ATC calculations must be more general.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☒ No

   Comments: This is a qualified yes. The three methodsologies will make it easier for the various regions in the country to comply with the standards. A single standard would be best, but it would come at a cost for entities to adapt to the single methodology if they are in an area that would have to implement changes to comply with the chosen methodology. The costs would likely not be prohibitive, however, and FERC could mandate a single methodology if they so chose to. We would prefer MOD-030 as a single standard. As the three methodologies now exist, MOD-030 appears to provide the greatest flexibility and accuracy.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☒ No

   Comments: We never thought FAC-012 or -013 should apply to ATC calculations. They are a system "test" and not a rigorous calculation of TTC for sale of transmission service.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: We understand that certain areas of the country may want Reliability Coordinators to be responsible entities, perhaps because they wear both the RC and TSP hat, but this is not a reason to include them. In the MISO footprint, it makes no sense to include the RC. However, we do think that a list of applicable entities should include the "Transmission Planner," as has been indicated in MOD-004 and MOD-008. This is more appropriate than the RC. As written, several entities are excluded from the applicability statement.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☒ Yes

   ☐ No

Comments:

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☒ Yes

☒ No

Comments: The more transparency there is in the process (except for commercially sensitive data), the better the process will be.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☐ Yes

☒ No

Comments: We agree that what is asked for is appropriate, but it may not be sufficient. For example, the ratings provided should include "any value used to limit AFC/ATC." Ratings can have time, temperature, and seasonal adjustments. As written, compliance might mean just a single ratings set. This could be handled in the compliance and measures section but additional thought should be given to this section.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☒ Yes

☐ No

Comments: This could be in measures and compliance and not necessarily in the requirements.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☒ Yes

☐ No

Comments: Certain areas of the country have tariffs (such as New England) that were approved by FERC and do not require the sale of transmission service. These areas could be saved a lot of grief by excluding them from these standards. However, they should be required to provide any data to their neighbors (such as their impacts on neighbor system flows) that might impact ATC calculations.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: Given that three methods are acceptable for calculating AFC/ATC, MOD-001 is a necessary prelude to any methodology chosen.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
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NERC Region		**Registered Ballot Body Segment**
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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☐ No

   Comments:

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: No direct instruction for informing public of ongoing ATC values is provided, although this process is an implied result of adhering to R3.1 and R5.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☐ No

Comments:

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☐ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Tom Mielnik	
Organization:	MidAmerican Energy Company	
Telephone:	563-333-8129	
E-mail:	tcmielnik@midamerican.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☒ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☒	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
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	☐	7 — Large Electricity End Users
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	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

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The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: I agree with team's decision to structure the standards in this manner but I have some comments about it. I believe the Standards Drafting Team should make it clearer in the MOD-001-1 that while one or more of the methods provided in MOD-028 through MOD-030 may be used by one party across a system, only one of these methods is to be used for a particular flowgate or for a particular path.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☒ No

   Comments: FAC-012 and FAC-013 need to be revised as necessary to cover other reliability needs for Transfer Capability measurements such as for unusual operating conditions that do not need to be the basis for commercial offerings.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: In practice in the industry, the calculation frequency is not consistent across all methodologies. In some cases the times for posting and the frequency of recalculations are slower to allow for time to validate the values calculated. I believe that reliability will suffer if validation is eliminated so as to meet a target that is set by the Standard.

Further, the frequency requirements should be consistent with currently filed FERC Operating Agreements. Therefore, I suggest that whatever frequency requirements are provided that they be qualified with allowances that "other frequency recalculation and posting times are allowed provided the Transmission Provider coordinates such frequencies and posting times with its neighbors and documents the valid reasons for adopting such frequencies". Also, alternatively or in addtion, the Standards Drafting Team should indicate that "if the Transmission Provider has filed FERC Operating Agreement(s) that provides for alternative recalculation frequencies and/or posting times that those frequencies and/or posting times are acceptable."

Also, I do not believe that separate weekly posting are required. If a Transmission Provider provides enough daily postings into the future to meet weekly needs, that these daily postings should be adequate. The way the standard is written now it appears as if weekly postings are required. The Standards Drafting Team should clarify that the frequencies and posting for weekly are only if the Transmission Povider posts separate weekly quantitites. (The FERC requires hourly, daily, and monthly postings so no such clarification is required for the other frequencies and posting times listed in the draft standard.)

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5. Do you agree the information to be included in the “Available Transfer Capability Implementation Document” that will be made publicly available (as required in R3) is appropriate and sufficient? If “No,” please explain why in the comments area.

☒ Yes

☐ No

Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If “No,” please explain why in the comment area.

☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: Transmission request evaluation is not the subject of this standard. If there are reliability reasons that require a standard that should be the subject of a new SAR and a new Standards Drafting Team.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If “Yes,” please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: 1. I question the approach in R1 that calls for the Transmission Service Provider, Planning Coordinator, and the Reliablity Coordinator to agree to the appropriate ATC methodologies. The Transmission Service Provider has the ultimate authority. Also there are no provisions in the standard for a way to resolve disputes. What happens if each of the three has a different idea as to which methodologies to use? I believe that the Planning Coordinator and the Reliability Coordinator should be responsible for resolving disputes between Transmission Service Providers if there are issues with regard to flowgates that involve more than one Transmission Service Provider. I suggest that either R1 be changed to have the Transmission Service Provider coordinate with the Planning Coordinator and the Reliability Coordinator the methodology or else, the words "as appropriate" be added to R1 so that, if necessary the functional entity that has the authority makes the decision when there is disagreement. 2. In R6, "other party" who may request the information should be changed to "other Functional Entity" so as to more properly describe the parties who might have a reliability need for the information. 3. The purpose of each of the standards should be revised to be more in-line with each other, that is some refer to "transparent" and "reliable system operations" and others do not. I recommend that the purpose in MOD-001-1 be revised to state: "To promote the consistent and transparent application and documentation of Available Transfer Capability (ATC) calculations for reliable system operations." 4. I note that the Standards Drafting Team has defined a scheduling horizon in addition to an operating horizon and a planning horizon. I am not familiar with the use of a scheduling horizon and questions why the Standards Drafting Team established it and why they have defined it as provided in the standard.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Dennis Kimm	
Organization:	MidAmerican Energy - Generation/Trading	
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E-mail:	ddkimm@midamerican.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☒ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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	☐	4 — Transmission-dependent Utilities
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Contact Organization:

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments: MidAmerican Trading believes that only two methodologies really exist and those are a Rated System Path and the Network Response Methodology. Those that do network response are just monitoring a different set of facilities, studying a different set of contingencies and recalculating using the laws of physics with a different frequency. MidAmerican Trading is also concerned that the standard drafting team is still making most of the requirements fill-in-the-blank requirements and more the the requirements should be in MOD-001 and standarized for all methodologies.

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☒ No

   Comments: FAC-012 and FAC-013 should be revised as necessary to clearly state that they are for covering the reliability needs for Transfer Capability measurements such as for unusual operating conditions to help establish operating guides or provide guidance to the operators and that are not the basis for commercial offerings or the for the decisions to accept or deny transmission service requests.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☐ Yes

☒ No

Comments: The document should also include a technical explanation of how transmission service requests are being evaluated.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☒ Yes

☐ No

Comments: ATC values are calculated for the evaluation of Transmission Service. If these processes aren't for the evaluation of TSRs, what are they for?

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☒ Yes

☐ No

Comments: This standard in conjuction with the other MODS (28/29/30) are in direct conflict with FERC order 890 requiring consistency.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

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NERC Region		**Registered Ballot Body Segment**
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Group Comments (Complete this page if comments are from a group.)

Group Name: Midwest Reliability Organization (MRO)

Lead Contact: **Tom Mielnik**

Contact Organization: **MRO for Group (GRE - for lead contact)**

Contact Segment: **10**

Contact Telephone: **563-333-8129**

Contact E-mail: **tcmielnik@midamerican.com**

Additional Member Name	Additional Member Organization	Region*	Segment*
Neal Balu	WPS	**MRO**	10
Terry Bilke	MIS0	**MRO**	10
Robert Coish, Chair	MHEB	**MRO**	10
Carol Gerou	MP	**MRO**	10
Ken Goldsmith	ALT	**MRO**	10
Todd Gosnell	OPPD	**MRO**	10
Jim Haigh	WAPA	**MRO**	10
Joe Knight	GRE	**MRO**	10
Pam Oreschnick	XEL	**MRO**	10
Dave Rudolph	BEPC	**MRO**	10
Eric Ruskamp	LES	**MRO**	10
Mike Brytowski, Secretary	MRO	**MRO**	10
28 Additional MRO Members	Not named above	**MRO**	10

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   ☐ Yes

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   Comments: The MRO agrees with team's decision to structure the standards in this manner but we have some comments about it. We believe the Standards Drafting Team should make it clearer in the MOD-001-1 that while one or more of the methods provided in MOD-028 through MOD-030 may be used by one party across a system, only one of these methods is to be used for a particular flowgate or for a particular path.

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   Comments: FAC-012 and FAC-013 need to be revised as necessary to cover other reliability needs for Transfer Capability measurements such as for unusual operating conditions that do not need to be the basis for commercial offerings.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: In practice in the industry, the calculation frequency is not consistent across all methodologies. In some cases the times for posting and the frequency of recalculations are slower to allow for time to validate the values calculated. The MRO believes that reliability will suffer if validation is eliminated so as to meet a target that is set by the Standard.

Further, the frequency requirements should be consistent with currently filed FERC Operating Agreements. Therefore, the MRO suggests that whatever frequency requirements are provided that they be qualified with allowances that "other frequency recalculation and posting times are allowed provided the Transmission Provider coordinates such frequencies and posting times with its neighbors and documents the valid reasons for adopting such frequencies". Also, alternatively or in addtion, the Standards Drafting Team should indicate that "if the Transmission Provider has filed FERC Operating Agreement(s) that provides for alternative recalculation frequencies and/or posting times that those frequencies and/or posting times are acceptable."

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	☐	3 — Load-serving Entities
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	☐	5 — Electric Generators
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	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☒	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: NPCC CP9 Reliability Standards Working Group

Lead Contact: **Guy V. Zito**

Contact Organization: **Northeast Power Coordinating Council**

Contact Segment: **10**

Contact Telephone: **212-840-1070**

Contact E-mail: **gzito@npcc.org**

Additional Member Name	Additional Member Organization	Region*	Segment*
Kathleen Goodman	ISO-New England	**NPCC**	2
Roger Champagne	HydroQuebec TransEnergie	**NPCC**	1
Ralph Rufrano	New York State Power Authority	**NPCC**	1
Al Adamson	New York State Reliability Council	**NPCC**	10
Greg Campoli	New York ISO	**NPCC**	2
Guy V> Zito	NPCC	**NPCC**	10

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

Project 2006-07 was initiated in 2006 to revise the then existing NERC reliability modeling standards to ensure the consistent and transparent calculation, verification, preservation, and use of Total Transfer/Flowgate Capability (TTC)/(TFC) and Available Transfer/Flowgate Capability (ATC)/(AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/TFC and ATC/AFC calculations and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/TFC and ATC/AFC. Such changes will enhance the reliable use of the bulk power transmission system without arbitrarily limiting commercial activity.

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The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☒ No

   Comments: Are FAC-012 and FAC-013 intended to be for only interfaces where transmission service is sold? If not, and these standards are intended to cover the establishment of intra-area interfaces, then the retirement of these standards would be leaving a gap that is not covered by other standards.

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: (1) Language needs to be clear that TSPs only have to calculate ATC for durations of service that they offer.
   (2) Regarding the frequency of the updates; it should be clear that if no inputs have changed that no recalculations are required. For example, for those entities that update ATC automatically based on receipt of service requests or a change in TTC, it would be burdensome to 'recalculate' on this stated frequency with no added value.
   (3) Regarding the timing of the updates; Suggest replace 'at' with 'no later than' so that the auditing aspect of this requirement is reasonable. Entities would be allowed to have calculated that data at any time prior to this required time point. Required timing of updates to be 'at' a

specific time creates an auditing trap. For example, how long does it take to perform a set of ATC calculations? Is this requiring that calculations be started at this time or completed by this time? Knowing when the calculations are completed will also provide a known time point for the posting requirements to be developed by NAESB.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☒ Yes

☐ No

Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: The evaluation of Transmission Service Requests is a Business Practice and should continue to be addressed under NAESB

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☒ Yes

☐ No

Comments: The current wording of Requirement 5 contains language that dictates precisely when ATC calculations must occur. There are areas with existing market rules and corresponding tariffs that dictate when publications of data occur (for example - after the clearing of a Day Ahead Market). NERC standards do not have the authority to require wholesale changes to existing market structures. Therefore, the wording of the timing of the required ATC calculations must be more general.

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: For those entities that do not provide physical transmission service, some of the requirements in these stanards do not apply. With the current arrangement of these proposed standards, the ATCID for these entities would clearly document what requirements of the standards are or are not applicable.

Please use this form to submit comments on the 2nd draft of standard MOD-001-1, Available Transfer Capability. Comments must be submitted by **June 24, 2007.** You may submit the completed form by e-mail to sarcomm@nerc.net with "ATC Standard" in the subject line. If you have questions please contact **Andy Rodriquez** at Andy.Rodriquez@nerc.net or by telephone at 609-947-3885.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Harvie Beavers	
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NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☒ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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Background Information

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On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments: You may desire to 'reference' the generator rating standards (FAC-005-0/FAC-009-1) that requires submission of facility ratings where needed.

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: This may be desirable if/when TSR's are unable to be fulfilled

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Bill Lohrma	
Organization:	Prague Power, LLC	
Telephone:	908-630-0289	
E-mail:	wwlohrman@praguepower.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☒ **NA – Not Applicable**	☐	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☒ Yes

   ☐ No

   Comments:

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☐ Yes

☒ No

Comments: The entities calculating ATC should also be required in Requirement R6to include and honor third party flowgate/path limitations in their ATC calculations if that data is provided by affected third parties.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☒ Yes

☐ No

Comments: a procedure should be established to reconcile differences across seams

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments: n/a

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Group Comments (Complete this page if comments are from a group.)

Group Name: Public Service Commission of South Carolina

Lead Contact: **Phil Riley**

Contact Organization: **Public Service Commission of South Carolina**

Contact Segment: **9**

Contact Telephone: **803-896-5154**

Contact E-mail: **philip.riley@psc.sc.gov**

Additional Member Name	Additional Member Organization	Region*	Segment*
Mignon L. Clyburn	Public Service Commission of SC	**SERC**	9
G. O'Neal Hamilton	Public Service Commission of SC	**SERC**	9
John E. "Butch" Howard	Public Service Commission of SC	**SERC**	9
Randy Mitchell	Public Service Commission of SC	**SERC**	9
C. Robert "Bob" Moseley	Public Service Commission of SC	**SERC**	9
David A. Wright	Public Service Commission of SC	**SERC**	9

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   ☒ Yes

   ☐ No

   Comments:

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   ☒ Yes

   ☐ No

   Comments:

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   Comments:

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   ☒ Yes

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   Comments:

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☒ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments:

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

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	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: Southern Company

Lead Contact: **DuShaune Carter**

Contact Organization: **Southern Company Services**

Contact Segment:

Contact Telephone: **205-257-5775**

Contact E-mail: **ddcarter@southernco.com**

Additional Member Name	Additional Member Organization	Region*	Segment*
JT Wood	Southern Company Services	**SERC**	1
Roman Carter	Southern Company Services	**SERC**	1
Gary Gorham	Southern Company Services	**SERC**	1
Marc Butts	Southern Company Services	**SERC**	1
Bill Botters	Southern Company Services	**SERC**	1
Ron Carlsen	Southern Company Services	**SERC**	1
Jim Howell	Southern Company Services	**SERC**	1
Jeremy Bennett	Southern Company Services	**SERC**	1
Jim Viikinsalo	Southern Company Services	**SERC**	1
Reed Edwards	Southern Company Services	**SERC**	5
Dean Ulch	Southern Company Services	**SERC**	1
Garey Rozier	Southern Company Services	**SERC**	5
Karl Moor	Southern Company Services	**SERC**	1
Chuck Chakravarthi	Southern Company Services	**SERC**	1

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

Project 2006-07 was initiated in 2006 to revise the then existing NERC reliability modeling standards to ensure the consistent and transparent calculation, verification, preservation, and use of Total Transfer/Flowgate Capability (TTC)/(TFC) and Available Transfer/Flowgate Capability (ATC)/(AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/TFC and ATC/AFC calculations and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/TFC and ATC/AFC. Such changes will enhance the reliable use of the bulk power transmission system without arbitrarily limiting commercial activity.

On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: The requirement is too prescriptive with respect to the times that the calculations need to be performed. Other processes (e.g., ramps, schedule updates, etc) are also being performed across the top of the hour. Each TSP should be allowed the flexibility to set a more appropriate time for recalculations.

   This requirement should also not require a recalculation of ATC unless the one of the components of the ATC equation changes.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

☒ Yes

☐ No

Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☐ Yes

☒ No

Comments: It is unclear why the TSP should exchange ATC recalculation frequency and times in R6.8 when they are prescribed in R5.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: The evaluation of Transmission Service Request are governed by the tariff and should remain so.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

1. As drafted, it is not completely clear as to which of the requirements would apply to long-term planning and which requirements would not apply. For example, R5 clearly limits the timeframe of the requirement to 13 months. However, R6 has no reference or indication of which timeframes this requirement would be applicable.

2. R6 requires that the data in R6.1 - R6.9 is shared with ". . . or other party with a demonstrated reliability need. . . ." To avoid potential conflicts with this data sharing, the term "reliability need" should be limited to those needs required to maintain reliability of the transmission system.

Please use this form to submit comments on the 2nd draft of standard MOD-001-1, Available Transfer Capability. Comments must be submitted by **June 24, 2007.** You may submit the completed form by e-mail to sarcomm@nerc.net with "ATC Standard" in the subject line. If you have questions please contact **Andy Rodriquez** at Andy.Rodriquez@nerc.net or by telephone at 609-947-3885.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
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Group Comments (Complete this page if comments are from a group.)

Group Name:	SERC Available Transfer Capability Working Group (ATCWG)
Lead Contact:	**John Troha**
Contact Organization:	**SERC Reliability Corporation**
Contact Segment:	**10 - RRO**
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Additional Member Name	Additional Member Organization	Region*	Segment*
Darrell Pace	Alabama Electric Cooperative, Inc	**SERC**	10
Helen Stines	Alcoa Power Generating, Inc.		
Eugene Warnecke	Ameren		
Don Reichenbach	Duke		
Joachim Francois	Entergy		
Ross Kovacs	Georgia Transmission Corporation		
Larry Middleton	Midwest ISO		
Jerry Tang	Municipal Electric Authority of Georgia		
John Troha	SERC Reliability Corporation		
Al McMeekin	South Carolina Electric and Gas Company		
Stan Shealy	South Carolina Electrica nd Gas Company		
Carter Edge	SERC Reliability Corporation		
DuShaune Carter	Southern Company Services, Inc. -Trans		
Bryan Hill	Southern Company Services, Inc. -Trans		
Doug Bailey	Tennessee Valley Authority		

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Background Information

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On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: Calculation frequency should be based on changes in system conditions or granting of additional transmission service. Calculations based on a set frequency would not improve reliability.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☐ Yes

☒ No

Comments: R6.9 needs clarification.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: The MOD standards define the bounds for reliably selling transmission service. Tarriff admin and business practices are based on FERC approved tarriffs that operate within these bounds.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	W. Shannon Black Et Al ; Sacramento Municipal Utility District	
Organization:	On Behalf of WECC MIC MIS ATC TF ; Varied Ballot Body Segments	
Telephone:	(916) 732-5734	
E-mail:	sblack@smud.org	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☒ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☐	3 — Load-serving Entities
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	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name: WECC MIC MIS ATC TF

Lead Contact: **W. Shannon Black**

Contact Organization: **Sacramento Municipal Utility District**

Contact Segment: **Various**

Contact Telephone: **(916) 732-5734**

Contact E-mail: **sblack@smud.org**

Additional Member Name	Additional Member Organization	Region*	Segment*
The 24 individuals listed in this same section for MOD-01 comments, filed jointly with this filing, by the WECC MIC MIS ATC TF Team, have either actively monitored this work product or have actively engaged in drafting the attached comments. That Team list of 24 individuals applies to jointly to MOD-01; MOD-04; MOD-08; MOD-29 and MOD-30.			

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

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   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☒ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☒ No

   Comments:

   First, the "Applicability" section uses the term "Planning Coordinator" which is not a defined term in the NERC Glossary. If the NERC Team intends it use, it should become a defined term.

   Second, where the term Planning Coordinator is used, WECC queries whether or not the more accurate entity would be the Transmission Planner.

   Third, this Standard should not apply to the Reliability Coordinator. The RC should be removed from R1 and R2. (See comments appended.)

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments:

   1)

The minimum calculation requirements should require recalculation during regular business hours, as opposed to every day at midnight.

2)
Currently, most of WECC utilizes OATI. If the OATI system is required to recalcuate the entire West at a single moment, that system may not be capable of doing the calcuations. Since OATI currently recalulates continuously as variables change, can the NERC Team draft language to allow for a recalculation or reposting within an hour as opposed to all entities doing so at a specified moment?

3)
The WECC Team in general has the following question of interpretation for the NERC Team. To the extent the WECC Team does not understand "how" tocomply with the requirements, it would seem the requirements are either overly vague or unenforceable as written. Please answer the appended question and rewrite for clarity.

The question revolves around the calculation frequency and required recalculation (forecasts?) of ATC going forward:

A. Does this recalculation requirement in any way mandate that transmission providers should adjust (hourly, daily, etc) ATC in response to network load variations?
Taken as currently written, this standard could be interpreted to require TPs to (1) forecast load variations, by path, by day (or hour), (2) reduce network (and possibly PTP) load reservations, "freeing up" future daily (or hourly if offered) ATC and (3) sell firm capacity going forward in response to a load forecast on a path by path basis. This is not a reasonable expectation for TPs to be 100% accurate in load forecasts, and this standard, if making the requirement outlined in the above interpretation, should be clarified to require TPs to update ATC only in response to future capacity sold, and not be required to reduce network reservations as a response to load forecasts to allow future short term firm sales on a daily (or hourly if offered) basis.

In the interpretation outlined above, if the transmission provider (or LSE) is incorrect in load forecasts, and the TP has sold short term firm in these "freed up" ATC periods, it would restrict network (and PTP) customers from scheduling up to their "before the hour" rights without curtailment.

5. Do you agree the information to be included in the “Available Transfer Capability Implementation Document” that will be made publicly available (as required in R3) is appropriate and sufficient? If “No,” please explain why in the comments area.

☒ Yes

☐ No

Comments: The WECC Team concurs that the stated content of the ATCID is appropriate. However, the term "ATCID" is used as a defined term without a definition. It is also used in multiple other standards. It should either be a defined term in the NERC Glossary or, at minuimum, must be cross referenced from all other standards back to this standard.

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If “No,” please explain why in the comment area.

☐ Yes

☒ No

Comments: See 9.D. below.

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☒ No

Comments: Evaluation of Transmission Service Requests is outside the scope of the Order(s) and more appropriately falls into the purview of NAESB as a Business Practice.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☒ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

A.

As to the "Horizons" identified in the draft at R2, the WECC MIC MIS ATC TF opines that there is no singular practice across the industry as to "Horizons"; however those provided by FERC do not generally comport with how the industry uses those terms.

The WECC Team suggests that the terms utilized in the draft are at best unclear and at worst not consistent with industry usage. It is suggested these "Horizons" be defined by NAESB as part of the ATC process and that their definitions be established in a manner that best reflects accurate industry usage.

B. R1. requires TSPs, PCs and RC to "agree upon and implement" a methodology. The standard suggests no remedy if the three parties cannot "agree." The Team suggests the TSP should be the sole entity to select the methodology. The TSP should have a condition precedent to consult with the PC and RC before selection and a condition subsequent to inform the PC and RC of the selection, seek counsel from those entities on how the methodology should be implemented and ultimately inform the PC and RC as to how that selected methodology will be implemented.

C. R5. Should read:

"Each Transmission Service Provider that calculates ATC for a Posted Path shall, at minimum…"

This requires the addition of the below FERC approved term as excerpted from 18 CFR 37.6 and as utilitized in NAESB R0-4005 in compliance with Order 889. (References below):

Posted Path

Posted Path means: 1) Any Balancing Authority to Balancing Authority interconnection; 2) any path for which service is denied, curtailed or interrupted for more than 24 hours in the past 12 months; 3) and any path for which a customer requests to have ATC or TTC posted. For purposes of this definition, an hour includes any part of an hour during which service was denied,

curtailed or interrupted. (Plagiarized from NAESBE R-4005 and Order 889, RM95-9-000, April 24, 1996, P. 58-60. See also: 18 CFR 37.6; http://a257.g.akamaitech.net/7/257/2422/12feb20041500/edocket.access.gpo.gov/cfr_2004/aprqtr/pdf/18cfr37.5.pdf

D. R6.

There is a concern that where two entities have not selected the same methodology, and where one requests data from the other, the requesting entity must still provide the requested data even if that data is not utilized in the methodology of the providing entity. In other words, an entity cannot be allowed to refuse data provision simply because that entity doesn't use such data in its selected methodology. The Requirement as drafted does not make this clear.

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Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Chuck Falls	
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Telephone:	602 236-0965	
E-mail:	Chuck.Falls@srpnet.com	
NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☐ **SERC** ☐ **SPP** ☒ **WECC** ☐ **NA – Not Applicable**	☒	1 — Transmission Owners
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Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

Background Information

Project 2006-07 was initiated in 2006 to revise the then existing NERC reliability modeling standards to ensure the consistent and transparent calculation, verification, preservation, and use of Total Transfer/Flowgate Capability (TTC)/(TFC) and Available Transfer/Flowgate Capability (ATC)/(AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/TFC and ATC/AFC calculations and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/TFC and ATC/AFC. Such changes will enhance the reliable use of the bulk power transmission system without arbitrarily limiting commercial activity.

On February 17, 2007 FERC issued Order 890 which directed, among other things, a number of reforms in the determination of ATC by requiring consistency in how TTC/TFC and ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/TFC and ATC/AFC. Then on March 16, 2007 FERC issued Order 693 which provided directives on modifying the NERC standards, including those related to modeling.

The standard drafting team was charged with revising the set of modeling standards related to ATC to comply with the FERC directives and stakeholder recommendations

The standard drafting team posted Draft 1 of standard MOD-001-1, ATC and AFC Calculation Methodologies, for a 30-day comment period beginning February 15, 2007. As stated in the comment form at that time, MOD-001-1 outlined the requirements for calculation of ATC and AFC, but did not provide requirements for the calculation of TFC or TTC. The drafting team identified two standardized methods of calculating TTC and from those values ATC, and one standardized method of calculating TFC and from that value AFC and a conversion to ATC. These methods are presented in the drafts being posted of three new standards: MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability. The proposed version of MOD-001 is an “umbrella” standard and it contains the general requirements applicable to ATC without regards to any particular methodology.

The standard drafting team would like to receive industry comment on the proposed requirements and structure of MOD-001-1 ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the ‘White Paper’ and the revised MOD-001 before answering the questions on the following pages. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with “ATC Standard” in the subject line.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. As stated above, the drafting team is posting three standards that specify requirements for three different acceptable methods for calculating TTC, TFC, AFC and ATC (i.e., MOD-028 Network Response Available Transfer Capability, MOD-029 Rated System Path Available Transfer Capability and MOD-030 Flowgate Network Response Available Transfer Capability) and one standard that encompasses the requirements that must be followed for calculating ATC, regardless of which of the other three standards are used, including a requirement to use one or more of the other standards, in an attempt to make the standards easier to follow.

   Do you agree with the drafting team's decision to structure the standards in this manner? If "No," please explain why in the comments area.

   ☐ Yes

   ☐ No

   Comments:

2. This standard and accompanying methodology standards (MOD-028, MOD-029, MOD-030) include requirements on establishing the Total Transfer Capability or Total Flowgate Capability that shall be used as input to the process. With the addition of these requirements for establishing TTC/TFC, do you believe that FAC-012 and FAC-013 should be retired? If "No," please describe what changes, if any, should be made to FAC-012 and/or FAC-013 in the comments area.

   ☐ Yes

   ☐ No

   Comments:

3. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please explain why in the comments area.

   ☐ Yes

   ☐ No

   Comments: .

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☐ No

   Comments:

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☐ Yes

   ☐ No

   Comments:

6. Do you agree the information to be exchanged with requesting entities (as required in R6) is appropriate and sufficient? If "No," please explain why in the comment area.

☐ Yes

☐ No

Comments:

7. Should the scope of MOD-001 be expanded to include requirements for the evaluation of Transmission Service Requests? Please explain your answer in the comments area.

☐ Yes

☐ No

Comments:

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

☐ Yes

☐ No

Comments:

9. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the draft standard MOD-001-1.

Comments:

R2 - More clarification is required regarding exactly what period of time each of the time horizons represent.

Please use this form to submit comments on the 2nd draft of standard MOD-001-1, Available Transfer Capability. Comments must be submitted by **June 24, 2007.** You may submit the completed form by e-mail to sarcomm@nerc.net with "ATC Standard" in the subject line. If you have questions please contact **Andy Rodriquez** at Andy.Rodriquez@nerc.net or by telephone at 609-947-3885.

Individual Commenter Information **(Complete this page for comments from one organization or individual.)**		
Name:	Clay Young	
Organization:	South Carolina Electric & Gas	
Telephone:	803-217-9129	
E-mail:	cyoung@scana.com	

NERC Region		**Registered Ballot Body Segment**
☐ **ERCOT** ☐ **FRCC** ☐ **MRO** ☐ **NPCC** ☐ **RFC** ☒ **SERC** ☐ **SPP** ☐ **WECC** ☐ **NA – Not Applicable**	☐	1 — Transmission Owners
	☐	2 — RTOs and ISOs
	☒	3 — Load-serving Entities
	☐	4 — Transmission-dependent Utilities
	☐	5 — Electric Generators
	☐	6 — Electricity Brokers, Aggregators, and Marketers
	☐	7 — Large Electricity End Users
	☐	8 — Small Electricity End Users
	☐	9 — Federal, State, Provincial Regulatory or other Government Entities
	☐	10 — Regional Reliability Organizations and Regional Entities

Group Comments (Complete this page if comments are from a group.)

Group Name:

Lead Contact:

Contact Organization:

Contact Segment:

Contact Telephone:

Contact E-mail:

Additional Member Name	Additional Member Organization	Region*	Segment*

*If more than one region or segment applies, indicate the best fit for the purpose of these comments. Regional acronyms and segment numbers are shown on prior page.

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   ☐ No

   Comments:

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   ☐ Yes

   ☐ No

   Comments:

4. Do you agree with the calculation frequency and schedule in R5.? If "No," please explain and suggest any alternatives you believe to be appropriate in the comments area.

   ☐ Yes

   ☒ No

   Comments: Recalculation of TTC/TFC should be due to a change in system conditions that warrant a recalculation. Recalculation of ATC/AFC should be due to a change in one or more of the components included in the ATC/AFC calculation formula (including TTC/TFC). No set frequency should be set for these calculations.

5. Do you agree the information to be included in the "Available Transfer Capability Implementation Document" that will be made publicly available (as required in R3) is appropriate and sufficient? If "No," please explain why in the comments area.

   ☒ Yes

   ☐ No

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   ☒ Yes

   ☐ No

   Comments:

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   ☐ Yes

   ☒ No

   Comments: NAESB Business Practices and OATT requirements should address this.

8. Are you aware of any conflicts between the proposed standard and any regulatory function, rule/order, tariff, rate schedule, legislative requirement or agreement? If "Yes," please identify the conflict in the comments area.

   ☐ Yes

   ☒ No

   Comments:

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   Comments: