

ATCT Drafting Team

June 12–13, 2007

Meeting Minutes

A regular meeting of the ATCT Drafting Team was held in San Francisco on June 12–13, 2007 from 8 a.m. (08:00) EDT to 5 p.m. (17:00) PDT.

The agenda and attendance lists are affixed as **Exhibits A** and **B**, respectively. Chairman Larry Middleton and pro tem Chairman Laura Lee presided jointly. NERC staff (Andrew Rodriguez) served as facilitator, and was assisted by additional NERC staff (Ed Ruck).

NERC Antitrust Compliance Guidelines

Mr. Rodriguez summarized the NERC Antitrust Compliance Guidelines.

Introductions and Roll Call

Participants around the room introduced themselves, and participants on the phone announced their presence. Bob Birch was in attendance as a replacement for Kiko Barredo.

Adoption of Agenda

The ATCT Drafting Team reviewed the meeting agenda. Nick Henery submitted comments on the agenda via e-mail, which were addressed as follows:

- Comment: To keep from doing a lot of rework on these items the existing SDT should wait for the personnel that will expand the team to help the existing SDT personnel in writing the Standard(s) for TTC.
 - *Response: If time were available, this could be handled in this manner. However, with the FERC compliance deadline approaching, we must continue working and get new members up to speed as soon as possible.*
- Comment: Work on the CBM, TRM, and ETC in completing these Standards and definitions.
 - *Response: Incorporated into agenda.*
- Comment: Since the accurate and reliable calculations of Firm ATC are the only reliability requirement the NERC SDT is responsible. Because all calculations and rules for determining Non-Firm ATC and Non-Firm ETC are business practices, move these issues and requirements to NAESB.
 - *Response: While some people in the group see merit in this discussion, in general, the group disagrees that Non-Firm ATC and ETC, and the associated sale of non-firm transmission service have no reliability impacts. Since these sales result in energy flows on the system, they can have reliability impacts. However, if time permits, the group will discuss this further. Incorporated into agenda.*

Narinder Saini moved the agenda be approved. The team approved the Agenda unanimously.

Approval of Meeting Minutes

The ATCT Drafting Team agreed to defer approval of the minutes until the second day of the meeting.

NERC Staff Report and Review of Timeline

Mr. Rodriguez provided a summary of the supplemental SAR, as well as the NERC 890 compliance filing. There was some discussion that we should tell FERC that we are not going to have enough time to meet the required deadline. However, the consensus of the group was to wait until more work had been done before we claimed any inability to meet their deadline. There was a brief discussion of what could happen if we did not meet the deadline: FERC may create their own standard, and it would make the industry consensus process appear ineffective.

Mr. Rodriguez reviewed the schedule. Barbara Rehman questioned the relationship between this schedule and a previous version circulated by Bill Lohrman. It was agreed that this schedule superseded the previous schedule. Mr. Rodriguez was assigned to update the website with the new schedule.

Review of Future Meetings

The team reviewed future meetings. Ron Carlson identified that it might be appropriate to have a meeting on July 11–13, to ensure we give ourselves enough time to complete our tasks. Mr. Rodriguez suggested elimination of some tentative meetings, and suggested meetings in September and November based on the timeline. The group agreed on the meeting schedule below, pending NAESB confirmation. Note the September meeting has potential for overlap with the NAESB ATC effort and will need to be closely coordinated; NERC will host the DC meeting.

June 28, 2007			Review Comments
ConCall/WebEx	1-3 EDT		Assign Comments for Reposnes

July 11-13 ATLANTA	DAY 1	8-11 EDT	Review Initial Responses
		11-3 EDT	Joint NAESB ConCall/WebEx - Joint Review of Initial Responses with NAESB - Review of NAESB Work
		3-5 EDT	Continue to Work on Responses
	DAY 2	8-5 EDT	Responses; Changes to Standards
	DAY 3	8-12 EDT	Compliance Elements

July 16-19, 2007 VANCOUVER	DAY 1	12-5 Local Time	Redrafting of Standards to address comments
	DAY 2	8-5 Local Time	Compliance
	DAY 3	8-5 Local Time	Compliance
	DAY 4	8-5 Local Time	Joint Review of Changes with NAESB Review of NAESB work

Week of Sept 9	TBD	TBD	Respond to Comments; minor changes
HOUSTON			

Nov 7-9, 2007	TBD	TBD	Respond to No Votes with Comments
DC			

FERC Interaction

Shannon Black provided some insight into the recent meeting of the Standards Committee, where the issue of NERC/FERC meetings was discussed. Mr. Black indicated that the members of the drafting teams should be allowed to participate in these discussions, and also suggested a forum for interacting with FERC be developed. With the input of Sedina Eric, the following process was developed:

ATCT Drafting Team
Meeting Minutes
June 12-13, 2007

- Solicit questions from the team (via e-mail; Mr. Rodriguez was instructed to solicit questions with a deadline of open of business the following day)
- Assemble the questions and review as a team
- Submit them to FERC Staff
- Optionally request an in-person meeting or teleconference to discuss (note that Mrs. Eric suggested giving 2 weeks lead time and scheduling for 1-2 hours)

During this discussion, Abbey Nulph suggested a question related to the posting of paths. Mrs. Nulph stated she would submit the question to Mr. Rodriguez via e-mail for consolidation.

Identification of Additional Work

Methodology Names and Definition

DuShaune Carter led the team through a review of the 1995 and 1996 ATC documents, and suggested new names for the standards that more closely aligned with those of the previous works. There was some question as to how the methods truly differed, and if so, is there a way to incorporate this into the definitions. The following names and general definitions were agreed upon:

- Area Interchange Methodology (replaces Network Response ATC). This methodology is characterized by:
 - An initial calculation of TTC for the interface (POR/POD or Source/Sink), followed by periodic recalculations to capture topology changes
 - Most facilities within the Balancing Area are considered
 - ATC is calculated by decrementing the nominal value of a reservation against a path from the path's TTC (unless that reservation has been incorporated into the model used to calculate TTC)
- Flowgate Methodology (replaces Network Response Flowgate). This methodology is characterized by:
 - The Total Flowgate Capability (TFC) is based on the rating of the elements or facilities that comprise the flowgate
 - The impacts of transmission usage is determined based on network response
 - Available Flowgate Capability (AFC) is recalculated continually, with re-evaluation of the impacts of transmission usage
 - The most limiting flowgate that impacts a path is used to determine the paths capability to accept additional reservations or planned uses
 - A specific list of facilities is analyzed, and the list is updated only periodically
- Rated System Path Methodology
 - An initial calculation of TTC for the path, followed by periodic recalculations to capture topology changes
 - Specific paths are selected for review, based on specified criteria
 - ATC is calculated by decrementing the nominal value of a reservation against a path from the path's TTC

Sharing and Using Data from Third Parties

The group discussed the current requirements. Three areas were discussed that might be useful for standardization of coordination:

- Models must be agreed upon with 1st-Tier neighbors
- Limits must be agreed upon with 1st-Tier neighbors
- Use the Data Exchange as appropriate

Mr. Black suggested that the next draft of MOD1 replace R6 with the following:

R.6. Subject to confidentiality and security requirements, each Transmission Service Provider shall provide, at minimum, the following data with any requesting Transmission

Service Provider, Planning Coordinator, Transmission Planner, Reliability Coordinator, Transmission Operator, or other party with a demonstrated reliability need:

- *Load forecasts (levels?)*
- *Generation dispatch, in the form of dispatch order, participation factors, or block dispatch*
- *Topology*
- *Transmission reservations*
- *Assumptions regarding transmission and generation facilities additions and retirements*
- *Power flow models*
- *Facility ratings*
- *Counterflows*
- *Existing transmission commitments*
- *ATC recalculation frequency*
- *Source and sink identification*
- *Third party allocation methodologies*

Each Transmission Service Provider, requesting data under R.6 shall utilize that specific data for purposes of consistency in the determination of ATC.

It was discussed that this, combined with usage requirements in the methodologies themselves, might be a good approach. Each methodology was reviewed, and the following table of applicability was developed which illustrates what values utilizes each piece of data:

FERC Requirement	Area Interchange	Flowgate	Rated System Path
Load forecasts (levels)	TTC	ATC/AFC	TTC
Generation dispatch, in the form of dispatch order, participation factors, or block dispatch	TTC	ATC/AFC	TTC
Gen and TX Outages (Planned)	TTC	ATC/AFC	TTC
Gen and TX Outages (Contingency)	TTC	ATC/AFC	TTC
Assumptions regarding transmission and generation facilities additions and retirements	TTC	ATC/AFC	TTC
Power flow models	TTC	ATC/AFC	TTC
Facility ratings	TTC	ATC/AFC	TTC
Existing transmission commitments	TTC	ATC/AFC	N/A
Source and sink identification	TTC	ATC/AFC	N/A

The question was raised with regard to load forecast: which load forecast? The team will need to specify the load forecast horizons, as well as the type of forecast (peak only, hourly, etc...) and confidence level.

Addressing Counterflows

The team discussed this concept for a significant period of time. The WECC procedure was reviewed. The concept of limiting counterflows by the amount of generation that could be unwound if the counterflows did not materialize was discussed. Ultimately, the team decided that

the best compromise may be to ask providers to specify in their methodology how they will address counterflows, both on internal and external facilities.

Same POR, Different PODs, and Generator Nameplate

Several different concepts were discussed by the team: using reservations based on queue time up to the max output of the generator; probabilistic weighting of the reservation impacts; non-simultaneous analysis for each reservation with summation at the end; and modeling the reservations differently (for each reservation, model it from the BA to the POD, but then model a single reservation from the POR to the BA at PMAX – this would reduce the “overuse” near the generator, but still hold capacity for the exports). Ultimately, the group was uncertain how to proceed, and desired to ask FERC for more details and clarification. The following language was drafted (Mr. Rodriguez modified post-meeting to formalize the language):

Please explain your thoughts with regard to paragraph 245 in Order 890. We are uncertain we understand the exact goal of this item. In order to be able to honor the requests and operate the system reliably, we must be able to identify and decrement the impacts of all the potential uses of the system as reserved, because any of those reservations could flow at any point in time (just not necessarily simultaneously). However, doing so when companies are allowed to buy more transmission service than they actually can physically use will result in the overestimation the Order seems to wish to eliminate. Is there a difference between the words “modeling for” and “accounting for” as used in the Order (and if so, what is that difference)? Is the goal to reduce overestimation of ETC at the POR, or at the interfaces with other entities? Is the intent to change the way transmission is evaluated at the time of reservation, or at the time the ETC is accounted for and ATC is posted?

This question will be added to the questions submitted for presentation to FERC.

Source to Sink Analysis and Treatment

The team discussed source/sink analysis. It was pointed out that WECC does not use source/sink analysis. The following general rules were agreed upon:

- If you are accounting for a reservation with a specified source and/or sink that you have discreetly identified in your ATC/AFC modeling process, the reservation should be accounted for as if it came directly from/to that point.
- If you are accounting for a reservation with a specified source and/or sink that you have “equivalence” in your ATC/AFC modeling process, the reservation should be accounted for as if it came directly from/to that equivalence. Note that providers should post these equivalences and associated mappings such that transmission customers can take them into consideration.
- If you are accounting for a reservation with a specified source and/or sink that you do not have “equivalence” in your ATC/AFC modeling process, the reservation should be accounted for as if it came from/to the POR or POD.
- If you are accounting for a reservation without a specified source and/or sink, the reservation should be accounted for as if it came from/to the POR or POD.

Respecting 3rd Party Limits

The team agreed that this item had been covered under the discussion of Data Exchange.

Retirement of FAC-012, FAC-013

The team agreed to wait until the new members of the team, as chosen by the SC, could attend the meeting.

Development of Compliance Effort

Mr. Ed Ruck discussed the compliance effort with the team. He indicated that to a large extent, the standards seemed well written for compliance, but said he had identified some areas that we

ATCT Drafting Team

Meeting Minutes

June 12-13, 2007

weak. Mr. Ruck pointed out that since the standards were still being drafted, and out for comment, that working on compliance might be pre-mature for some of the areas contained in the standards. Mr. Ruck volunteered to draft an initial set of compliance elements for one of the standards, to present the following day. Mr. Ruck also agreed to work with the rest of the compliance team to address staffing needs, if necessary.

Evening Adjournment

The team adjourned the meeting for the evening.

Morning Reconvening

Mr. Middleton and Ms. Lee reconvened the meeting.

NERC/NAESB Joint Meeting Minutes

June 13, 2007

Meeting Minutes

The ATC Drafting Team met jointly with representatives from the NAESB Business Practices Subcommittee on June 13, from 8 a.m. (8:00) PDT to approximately 2:30 p.m. (14:30) EDT

NERC Antitrust Compliance Guidelines

Laura Kennedy summarized the NERC Antitrust Compliance Guidelines.

Introductions and Roll Call

Participants around the room introduced themselves, and participants on the phone announced their presence. Bob Birch was in attendance as proxy for Kiko Barredo.

Review of Joint Agenda

The group reviewed the joint agenda, and agreed that it represented the business of the day. Ross Kovacs moved the agenda be approved. The joint participants approved the agenda unanimously.

Review of Future Meetings

Mr. Rodriguez reviewed the meeting schedule discussed the day prior. Mrs. Kennedy indicated that she would work with NAESB staff to ensure appropriate meeting coordination.

Joint Review of Work

NERC Status Report

Mr. Rodriguez summarized the status of the NERC work to date, including:

- Posting of the current drafts
- The supplemental SAR to address the TTC components of Order 890
- The NERC and NAESB 890 filings
- The FERC Q&A process raised during the previous day's discussion

The question was raised as to when new members of the team (in response to the supplemental SAR) would be announced. Mr. Rodriguez was assigned to obtain the answer to this question.

Review of Reliability Standards

Mr. Rodriguez asked if the NAESB team had any need to review the draft NERC standards. The NAESB team indicated all their items were captured in their comments.

NAESB Comments on NERC Draft Standards

NAESB "Handoff" Items

Mrs. Kennedy walked the group through the comments the NAESB team had. These comments, and the ATCTDT responses, are attached as **Exhibit C**. It was suggested during the discussion by Alan Pritchard that perhaps the NERC standards should not deal with "public posting" at all, as this is not a reliability issue, but a commercial issue. The team agreed to consider this as it works on the next version of the standards. Mr. Dennis Kimm questioned if MOD-001 R6 applied to customers, and requested this issue be discussed in a future meeting. It was suggested that

ATCT Drafting Team

Meeting Minutes

June 12-13, 2007

MOD-028 R3., MOD-029 R6., and MOD-030 all need to have more clear definitions of "path." The ATCT Drafting Team asked NAESB to consider if there needed to be a formal business practice to describe how a new path was requested. Mr. Rodriguez was assigned to send the responses to NAESB.

NAESB Status Report

Review of Business Practice Standards Work

Mrs. Kennedy presented the draft Business Practice Standard that would replace MOD-003. The language and ATCT Drafting Team comments are attached as **Exhibit D**. In general, the team was concerned that the language was very loose and did not make any significant requirement on the TSP. Mr. Rodriguez was assigned to send the comments to NAESB.

New Business

No new business was identified

Joint Meeting Adjournment

The Joint meeting was adjourned.

ATCTDT Meeting Minutes

The following are the continuation of the minutes of the NERC ATCTDT meeting.

Approval of Meeting Minutes

The Drafting Team identified minor changes to be corrected: the spelling of DuShaune, the spelling of Abbey, and the name of British Columbia Transmission Corporation. The ATCT Drafting Team approved the following sets of minutes contingent on the correction of these errors:

- May 15–17, 2007 (moved DuShaune Carter)
- May 22, 2007 (moved Laura Lee)

The approvals were unanimous.

Identification of Additional Work (continued)

Development of Compliance Effort

Mr. Ruck talked to the team about the compliance effort, and walked the team through a draft set of compliance measures for the CBM standard. Mr. Ruck identified a few shortcomings in the CBM standard, which the team will need to address. Mr. Ruck agreed to send the team the current set of compliance guidelines for use in drafting the standards.

The team also discussed how ERCOT would comply with these standards, since they do not use ATC. Regional Differences were discussed. It was questioned if we could change the applicability such that the standard did not apply to ERCOT. Mr. Kimm suggested the following language: This standard applies to parties who 1.) Provide transmission service, or 2.) Are synchronously connected to a party that provides transmission service. With ERCOT registered as a TSP, this may not address the issue. It was also discussed that there may be a need to split the Data Exchange requirements from the ATC Calculation requirements, such that all parties (including ERCOT) were subject to the data exchange requirements. Mr. Rodriguez to review the manner in which “Regional Differences” are to be handled.

“Undesignated” Resources and Impacts on Calcs

Mr. Dennis Kimm discussed this and how it applied to “slice of system” sales. There were several questions around this issue, related to tagging, network service, and modeling. The team felt this might be a longer-term issue than can be addressed within this revision of the standard.

Work on completing the CBM, TRM and ETC Standards and definitions

The team agreed that this work was in progress.

Should Non-Firm ATC and Non-Firm ETC be considered business practices and therefore moved to NAESB?

The team discussed this item, and concluded that Non-Firm ATC and ETC were needed as reliability standards, based on the fact that the unanalyzed selling of non-firm service could result in transmission overloads.

FERC Interaction (continued)

The group discussed the previous day’s requests for questions to the commission. Five questions were submitted; three were deemed to be inappropriate for the ATCTDT to send to FERC. The two questions that will be asked of FERC are as follows:

- 1.) For entities that use the Flowgate methodology, there may exist an extremely large number of POR/POD combinations (for example, in BPA, there is over 10,000 paths). Instead of posting a fixed list of path ATCs that may run hundreds of pages in length, is it acceptable to provide a query tool that allows a customer to electronically request (both via user interface and programmatically) the ATC value for a specific path and timeframe?

- 2.) Please explain your thoughts with regard to paragraph 245 in Order 890. We are uncertain we understand the exact goal of this item. In order to be able to honor the requests and operate the system reliably, we must be able to identify and decrement the impacts of all the potential uses of the system as reserved, because any of those reservations could flow at any point in time (just not necessarily simultaneously). However, doing so when companies are allowed to buy more transmission service than they actually can physically use will result in the overestimation the Order seems to wish to eliminate. Is there a difference between the words “modeling for” and “accounting for” as used in the Order (and if so, what is that difference)? Is the goal to reduce overestimation of ETC at the POR, or at the interfaces with other entities? Is the intent to change the way transmission is evaluated at the time of reservation, or at the time the ETC is accounted for and ATC is posted?

Original language of the questions is contained in Exhibit E.

Adjourn

The meeting was adjourned.

Exhibit B — Attendance List

Larry Middleton	Midwest ISO
Laura Lee	Duke Energy
Matthew Adams	WebEx only; unidentified
Daryn Barker	E.ON-US Energy Services, Inc.
Bob Birch	Florida Power and Light Company
Rebecca Berdahl	Bonneville Power Administration
Shannon Black	Sacramento Municipal Utility District
Bill Blevins	ERCOT
Jonathon Booe	WebEx only; unidentified
Ron Carlson	Southern Company
DuShaune Carter	Southern Company
Blaine Erhardt	Basin Electric Power Cooperative
Anthony Ewsing	United Illuminating
Chuck Falls	Salt River Project
John Johannis	WebEx only; unidentified
Francis Halpern	WebEx only; unidentified
Ray Kershaw	ITC Transmission
Dennis Kimm	MidAmerican Energy Company
Ross Kovacs	Georgia Transmission Corporation
Cheryl Mendrala	ISO New England
Abbey Nulph	Bonneville Power Administration
Alan Pritchard	Duke Energy
Barbara Rehman	Bonneville Power Administration
Narinder Saini	Entergy Services, Inc.
Nathan Schweighart	Tennessee Valley Authority
Jerry Smith	Arizona Public Service
Stephen Tran	British Columbia Transmission Corporation
Don Williams	PJM Interconnection
Kathy York	Tennessee Valley Authority
Laura Kennedy	NAESB
Ed Ruck	NERC
Andrew Rodriquez	NERC

Exhibit C — NAESB Comments of NERC Standards

HANDOFF ITEMS – Items identified in the draft NERC Reliability Standards that will require NAESB Business Practice Standards

NERC MOD001 (Available Transfer Capability) – References are made to the document posted at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/MOD-001-1_ATC_30-day_comment_25May07.pdf

- **R3:** Business Practices are needed; need to address whether modification to S&CPs are needed
 - Comment and continuing with this line of thought: Is it okay to post this info on OASIS? If so, this last bullet of R3 is no longer needed and the last bullet of R4 will need to be modified. However, if it is not okay to post on OASIS that will substantially change how NAESB drafts the corresponding BP. In addition, NAESB would plan to provide a link on OASIS to the document rather than creating a template in the S and CP that would detail all the elements of the requirements. The BPS and ESS/ITS request feedback from the NERC SDT. How would the last bullet of R4 be modified? See R4
 - Language Drafted on 6/11/2007

ATCTDT Response:

Yes, this document would be posted on OASIS. It does not have to be a template in the S&CP.

NERC MOD028 (Network Response Available Transfer Capability) – References are made to the document posted at:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/MOD-028-1_NRATC_30-day_comment_25May07.pdf

- **R2:** Business Practices are needed for posting of contingencies and assumptions
 - Question from the ESS/ITS and BPS to NERC for R2: This requirement does not say this will be a list. Is it meant to be a list? Does it include generation outages? Would the list be for different time horizons? If for different time horizons, NERC will need to clarify. Will it be dynamic list for the different time horizons? Would the list include dynamic line ratings?

ATCTDT Response:

- 1.) This is intended to be a list of Generation and/or TX contingencies. These are not outages – these are the contingencies you are testing (studied contingencies). It should be relatively static list, but would probably change for topology changes (new facilities) and could exist for different time horizons. It would not include dynamic ratings.**
- 2.) “Assumptions” is intended to mean “the criteria used to choose the contingencies.” We will clarify in the next version. We believe it should be**

included as an intro to the list. Perhaps NAESB should provide a “sample” to the industry, showing how to format this information (what file type, what layout, etc...)?

- **R3:** Business Practices are needed for publicly available posting
 - Would this require posted paths or all POR and POD combinations, even if not commercially offered as ATC? (Need to review Order 890, Paragraph 193)

ATCTDT Response:

This does not require all POR POD combinations, and does not require all posted paths. It specifies that a list must be posted, and at a minimum, have paths to/from neighbors. It is expected that providers will already have a list that complies with this requirement. This should be a list of paths.

- **R8:** S&CP templates include this information

ATCTDT Response:

We are not requiring that this be in the ATCID. The existing S&CP standards may already meet these requirements.

- **R11.7:** Review to determine what business practices are needed; may be for temporary “un-designation” of Designated Network Resources
 - NAESB Subcommittee believes the NERC definition of post-backs is too narrow

ATCTDT Response:

We will look at clarifying the language to make clear what “released” means, to avoid confusion with gas capacity release. We also now recognize that there are additional post backs, and may need to make this statement more generic.

- **R14.6:** What is the intent of the language in 14.6? Firm capacity is not released on the Parent Reservation’s path when a Redirect on a non-firm basis service is provided.

ATCTDT Response:

We will clarify by changing this language to read “Post-backs of non-firm ATC due to the reinstating of Firm from a “Firm-to-Non-Firm” redirect.”

- **R16:** Business Practices are needed for publicly available posting
 - Already provided on OASIS

ATCTDT Response:

The existing S&CP standards may meet these requirements.

NERC MOD029 (Rated System Path Available Transfer Capability) – References are made to the document posted at:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/MOD-029-1_RSPATC_30-day_comment_25May07.pdf

- **R2:** Business Practices are needed; Question of whether there is standard report form. There is not a formal S&CP template.

ATCTDT Response:

No, there is no standard template today. This would be a written report (in electronic format that can be downloaded), that may include images, maps, charts, etc... but is NOT intended to include supporting data or information (like models).

- **R9:** OASIS already has a template to address this item.
 - Are these the same reports referenced in R2?

ATCTDT Response:

We will modify R9 to eliminate the “report,” as you are correct – it is already covered in R2.

It is acceptable if OASIS S&CP already addresses this item.

- **R12.7:** See NAESB Question/Comment for 11.7 of MOD028

ATCTDT Response:

We agree; see previous answer.

- **R13:** Need to review to determine if business practices are needed
 - Question: What are the inputs; think there may be a numbering error in there

ATCTDT Response:

We agree; we will correct in next version.

- **R14.5:** See NAESB Question/Comment for 11.7 of MOD028

ATCTDT Response:

We agree; see previous answer.

- **R16:** Template already provided on OASIS

ATCTDT Response:

It is acceptable if OASIS S&CP already addresses this item.

NERC MOD030 (Flowgate Network Response Available Transfer Capability) –

References are made to the document posted at:

ftp://www.nerc.com/pub/sys/all_updl/standards/sar/MOD-030-1_FGNRATC_30-day_comment_25May07.pdf

- **R3:** Need to develop OASIS posting requirements for all flowgates
 - Does the book of flowgates need to be maintained on OASIS?

ATCTDT Response:

No, but the TSP's list of flowgates should be.

- Will this information be included in the ATCID?

ATCTDT Response:

Not required to be in the ATCID, but putting it there would meet the requirement. We look to NAESB to specify where it should be.

- Is there another place for the flowgates to be registered other than OASIS (TSIN)?

ATCTDT Response:

Currently, we are not suggesting a registry of flowgates. Rather, this would be a list of flowgates. However, a registration process of some kind to ensure use of a standardized naming convention for flowgates might be helpful to the industry.

- **R11:** Need to develop OASIS posting requirements for posting of TFC calculations; need to determine if on a template or on a list.

ATCTDT Response:

It is uncertain if R11 will stay. If R11 remains, then the values should be included with the flowgate list.

- Was this required of NERC for Order 890?

ATCTDT Response:

No.

- **R14:** See NAESB Question/Comment for 11.7 of MOD028

ATCTDT Response:

We agree; see previous answer.

- **R18:** See NAESB Question/Comment for 11.7 of MOD028

ATCTDT Response:

We agree; see previous answer.

- **R21:** Determine if information to be provided on a template or provided in a list/report
 - What was the intent of this requirement? Must AFC calculations be converted to ATC or posted in conjunction with ATC for those using AFC?

ATCTDT Response:

As written, you are required to post both. If we decide to eliminate R21, this may change. We recommend that NAESB identify the best way to show this. Note that it may require firm and non-firm AFCs, and per-product AFCs.

- **R24:** Already a template on OASIS
 - Is there an expectation that the AFC information be posted on OASIS?

ATCTDT Response:

See discussion on R21.

NERC MOD004 (CBM) – References are made to the document posted at: ftp://www.nerc.com/pub/sys/all_updl/standards/sar/MOD-004-1_CBM_30-day_comment_25May07.pdf

- **R1:** Need to determine if information will be provided via a template or on info.htm (1.1, 1.2, and 1.3 info.htm. 1.4 probably part of a template response; currently part of SystemData.)
 - **R1.4:** Would this require posted paths or all POR and POD combinations, even if not commercially offered as ATC? (Need to review Order 890, Paragraph 193)

ATCTDT Response:

This should be for the same posted paths as described in MOD-028.

- **R1.4:** Over each posted flowgate?

ATCTDT Response:

This should be for the same posted flowgates as described in MOD-030.

- **R2:** Need to determine if need to provide a conduit for making the request; develop OASIS business practices for posting the information once it is made public
 - Provision of this information is dependent on a request, should the language be “publicly available” or just “available”?

ATCTDT Response:

We will clarify. The intent will be that if someone asks for the powerflow model, it will be posted so anyone can see it. We will look at all the references to “publicly available” or other distribution requirements and see if we can standardize how we refer to different levels of confidentiality (anyone, anyone with need/read only,

customer, provider, etc...). We will also look to see if there are pre-existing standards for this that we can utilize.

- **R7.3:** Need to develop posting requirements
- **R8:** Determine if have mechanism for making the request
 - Should be reviewed by JISWG
- **R12:** Need to develop posting requirements
 - What is the name of the report in R11?

ATCTDT Response:

We will call this the “CBM Usage Report” and update R11 and R12. Note that R11 could be done as a template, to streamline reporting.

NERC MOD008 (TRM) – References are made to the document posted at:
ftp://www.nerc.com/pub/sys/all_updl/standards/sar/MOD-008-1_TRM_30-day_comment_25May07.pdf

- **R7:** Develop posting requirement for posting of TRM calculation methodology
- **R8:** Determine if have mechanism for making the request
 - Contact information is provided in language for adoption of MOD003 as business practice
- **R10:** The functionality for posting the TRM values exists on OASIS; will ensure that business practices are comprehensive enough to address the requirements

Exhibit D — Business Practice Replacing MOD-003

- 0xx.1 Each Transmission Service Provider shall post in INFO.HTM on the OASIS home page, its procedure for receiving and addressing questions about the applicable Available Transfer Capability methodology. Information in the procedure should include, but is not limited to:
- 0xx.1.1 Current Transmission Service Provider contact information for questions.
 - 0xx.1.2 The amount of time it will take to acknowledge receipt of the question.

ATCTDT Comments:

Order 693 Para 1065 and 1066 indicated that the Reliability Standard (MOD-003) was not detailed enough to approve as a mandatory Reliability Standard. If the new BP standard has less detail, it is unlikely to be accepted as a standard. In order to address transparency, this probably needs to be more detailed.

The Reliability Standard MOD-003 suggested that a customer could use this conduit to question values. We note that the new standard does not – it only allows for questions about the methodology. One concern with this limitation is that anyone who wants to question the actual values may be talking to the wrong person. For example, if the person who develops the methodology is different from the person who implements it, they might not be able to answer questions about a specific value.

We would like to see some more aggressive and specific measures, such as:

- Each TSP shall respond to any question within 2 business days.**
- The response must either include the answer to the question, or provide an estimate of the amount of time needed to fully respond.**

Another area that may need to be addressed by NAESB (possibly under this standard) would be a description of how people can request and receive data if they want it. MOD-001 R6 addresses request for reliability entities; there may need to be a similar NAESB BP for commercial reasons. Note that it would need to address CEII and confidentiality.

Exhibit E — Original Questions for the FERC

Discussion on posting of Path ATCs - On very large systems where the TSP has elected to manage flowgates and calculate AFCs, the requirement to convert these AFC values into ATC for OASIS posting could result in much slower transfer capability updates (and therefore, less transparency) due to the TSP being required to track, for example, tens of thousands of path ATCs vs. 10 flowgate AFCs. I believe that greater consistency and transparency is achieved if only AFC values are posted for each flowgate, and requestors are provided with a "conversion calculator" that calculates ATC for their requested path based on posted AFCs.

QUESTION — Is it acceptable that TSPs that manage flowgates be required to post AFC values, rather than ATC values?"

Discussion on Pre-confirmed Reservation Priority—890—para 1401-1407 A new pre-confirmed request for transmission service would preempt a request of equal duration that has been accepted by the TP but not yet confirmed by the transmission customer.

QUESTION — So I take back service after it has been granted but not yet confirmed?

Discussion on narrative explanation para 369--TP required to post a brief, but specific, narrative explanation of the reason for a change in monthly and yearly ATC values on a constrained path. The narrative is required when a monthly or yearly ATC value changes only as a result of a 10% change in TTC.

QUESTION — Are these changes normal changes to system topology like add/delete/long term outage of facilities that effect TTC and key facility ratings?

Discussion on zero yearly ATC postings para 371--TPs shall post a narrative with regard to monthly or yearly ATC values when ATC remains unchanged at a value of zero for a period of six months or longer.

QUESTION — PJM posts a zero ATC for yearly and evaluates requests for ATC, etc.; Do we need to post some calculated ATC value for yearly?