

Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

Please use this form to submit comments on the 1st draft of standard MOD-030-1 Network Response Flowgate ATC. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with "NRFG 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:	E. Nick Henery	
Organization:	APPA	
Telephone:	202-467-2985	
E-mail:	nhenery@APPAnet.org	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input checked="" type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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 Capability (TTC)/Available Transfer Capability (ATC)/Available Flowgate Capability (AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/ATC/AFC calculation and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/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/ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/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 modeling standards 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 standard drafting team would like to receive industry comments on the proposed requirements and structure of MOD-030-0 Network Response Flowgate ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the 'White Paper' and MOD-030-1 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 "NRFG 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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: These requirements should be in the FAC series and developed by personnel who are experienced in the determination of flowgates and their limitations. The requirements, as written are requiring improper use of the values stated in the requirements.

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: These requirements are tariff or contract requirements that will be contained in or a part of a regulatory or legal document. Some of these requirements are not a reliability issues since and should be removed. Those statements that want to know the effects of actions that are of a reliability nature will be determined by other functions not the TSP, which just sell transmission capacity.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: Need to let the expanded SDT review this by personnel knowledgeable in development of AFT and distribution factors.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: This Standard trys to provide detail requirements for AFT, ATC, ETC and the requirements of 3 different functional entities and it is written in a manner that will not support a Compliance program.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why 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.

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments:

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments:

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments:

9. 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 the conflict in the comments area.

Yes

No

Comments:

10. 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-030-1.

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Abbey Nulph	
Organization:	Bonneville Power Administration	
Telephone:	(360) 619-6421	
E-mail:	ajnulph@bpa.gov	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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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/ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/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 modeling standards 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 standard drafting team would like to receive industry comments on the proposed requirements and structure of MOD-030-0 Network Response Flowgate ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the 'White Paper' and MOD-030-1 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 "NRFG ATC Standard" in the subject line.

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

1. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? 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.

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: The impact of load growth for Network Integration Transmission Service should be included in the second sub-bullet of R14.

The "five years or longer in duration" language should be removed from the fifth sub-bullet of R14. due to the fact that this element of Order 890 is only to be implemented by a Transmission Service Provider (TSP) once the FERC has approved the TSP's Attachment K -- this may not occur for some TSPs until after the standards are to be implemented. Additionally, regardless of whether a TSP's Attachment K is approved, there will be a transition period (to be developed by each TSP) from the old 1-year/60-day roll-over paradigm to the 5-year/1-year -- the standard should not preclude a TSP from encumbering capacity for those existing Customers who have not yet been required to commit to five years of service to retain their roll-over rights.

The ninth sub-bullet should include all other impacts and not just the impacts using transmission service to service Native Load or firm Network Integration load. Therefore, "using transmission that serves Native Load or Firm Network Integration Transmission Service" should be deleted.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: However, for the reasons explained in our response to the MOD-030-1 Comment Form's question 4, BPA suggests that R22. be modified to the following:

" The Transmission Service Provider shall make publicly available a mechanism for interested parties to convert Flowgate AFCs to path ATCs based on..."

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: Under the flowgate methodology, ATC is a value derived from an analysis of the expected powerflow impacts of a reservation across multiple flowgates. Consequently, it is the posting of AFC and timely posting of changes to AFC that inform whether transfer capability exists to support a request for transmission service. ATC for a POR-POD path is derived from posted AFC. When posting both ATC by path as well as AFC by Flowgate, there is a risk that the AFC and ATC values could get "out of sync" due to automation lag-time, etc. BPA believes 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 AFC's.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments:

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

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.

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments:

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: The threshold of 3% appears to be an arbitrary level. This level may be rooted in Operational and Planning studies that consider impacts from outages on one TP's system that increase loading on an element of another TP's system by 3% or more. While this level may be a good indicator of impact, it may not provide an indicator of which party's ownership or allocation of facilities is being used. It does not assure TPs will be able to preserve their rights (i.e. by contractual allocation) with a fixed threshold of 3%.

9. 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 the conflict in the comments area.

Yes

No

Comments:

10. 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-030-1.

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 descriptions of these methodologies.

The Applicability section 4.1. through 4.3. should have the phrase "Available Transfer Capabilities for paths" replaced with "Available Flowgates Capabilities for Flowgates".

R1.2. should be modified due to the fact that Facilities don't cause congestion, rather they experience congestion. The following change to the language would be more accurate:

"How the methodology identifies transmission Facilities that are expected by the AFC calculator to experience congestion on the transmission system."

R3. A Flowgate should not be defined as a thermal, voltage, or stability type due to the fact that Flowgates are limited by thermal, voltage, or stability problems that can vary depending on system conditions.

R4. through R8. should be combined into two requirements:

1) Each entity generating Flowgate limit values (note that it's not clear if this should be the Transmission Owner, Transmission Planner, Planning Coordinator, and/or Reliability Coordinator) shall provide current Flowgate limit data to Transmission Service Providers (TSPs); and

2) TSPs shall use the lesser of the thermal, voltage, or stability limits that apply to the current system conditions.

R18.-sub-bullet 5, R23., and R24. should each have the "ATC"s replaced with "AFC"s, for the reasons explained in our response to the MOD-030-1 Comment Form's question 4.

R24. should have "path" replaced with "Flowgate", for the reasons explained in our response to the MOD-030-1 Comment Form's question 4.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Greg Rowland	
Organization:	Duke Energy	
Telephone:	704-382-5348	
E-mail:	gdrowlan@duke-energy.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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1. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments:

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments:

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments:

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments:

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments: Conditional Firm Service (CFS) and Planning Redispatch Service (PRS) under Order No. 890 create new issues relating to modeling and calculating ATC. Specifically, when PRS is offered to maintain service, modeling for ATC calculations will be impacted during these periods. TTC must be modeled/calculated accounting for the new CFS/PRS requirements.

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments:

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

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No

Comments:

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Yes

No

Comments:

9. 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 the conflict in the comments area.

Yes

No

Comments:

10. 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-030-1.

Comments: R1.1 does not create the same level of transmission service as created in MOD-028. MOD 028 R6.1 involves N-1 transmission contingency AND ramping/partial contingency of generation. MOD-030 R1.1 appears to only require N-1 transmission or generation contingency. This is not comparable service.

For R3. need to also include why the Flowgate is a limit

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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	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
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*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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1. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: R5 reference to Transmission Operator should be changed to Transmission Owner.

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: Sub requirements shown as bullets should be changed to numbered subrequirements in R14, R16 and R18.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: The requirement should be worded in simple language to reflect how AFCs are determined rather than an equation that a program can use in developing program.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: AFCs are not required to be posted as these do not mean much to the users, therefore, R21 should be deleted.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments:

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments:

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments:

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: The threshold level of 3% for third party should not be included in this standard since there is no such threshold level for Transmission Service Provider's own data.

9. 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 the conflict in the comments area.

Yes

No

Comments:

10. 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-030-1.

Comments:

Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

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

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 Capability (TTC)/Available Transfer Capability (ATC)/Available Flowgate Capability (AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/ATC/AFC calculation and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/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/ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/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 modeling standards 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 standard drafting team would like to receive industry comments on the proposed requirements and structure of MOD-030-0 Network Response Flowgate ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the 'White Paper' and MOD-030-1 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 "NRFG 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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: See IRC comments submitted by Charles Yeung.

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: See IRC comments submitted by Charles Yeung.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: See IRC comments submitted by Charles Yeung.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: See comment 9.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments: See IRC comments submitted by Charles Yeung.

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments: See IRC comments submitted by Charles Yeung.

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments: See IRC comments submitted by Charles Yeung.

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: See IRC comments submitted by Charles Yeung.

9. 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 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 Interconnection. 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 Interconnection 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 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 therefore 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 Entities required to conform to the standards are those that are synchronously connected with other Control 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.

- 10.** 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-030-1.

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Dave Folk	
Organization:	FirstEnergy Corp.	
Telephone:	330-384-4668	
E-mail:	folkd@firstenergycorp.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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The standard drafting team was charged with revising the modeling standards 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.

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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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments:

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: However, the term "Post-backs" is industry jargon and should be replaced with the term "reinstatement" to add clarity.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments:

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: The standard should include specifics of methods for complying with the term "publicly available" such as posting on OASIS, a corporate web page, etc. (This concept is mentioned in all MOD-028, MOD-029, and MOD-030.)

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments:

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

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, eliminate duplication, and simplify the applicability sections of MOD-028, 029, and 030

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments: However, the phrase "not exceed" can be replaced with the word "the" since the term "limiting the total impact" is synonymous.

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments:

9. 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 the conflict in the comments area.

Yes

No

Comments:

10. 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-030-1.

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Ron Falsetti	
Organization:	IESO	
Telephone:	905-855-6187	
E-mail:	ron.falsetti@ieso.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments:

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: R14:

It is not clear if the standard requires all inputs to be included in the calculation of the impact of Firm ETC. If so, 2 of bullet points are questionable:

- FIRM NITS Reservations (second bullet point) are only explicitly incorporated in ETC if they cross control area boundaries. (POR not equal to POD) Otherwise they are part of the base-flow calculations - Designated Network Resources (DNRs) serving Native Load (first bullet point). In order to clarify, we could add to the second bullet: "not otherwise included in TRM or CBM or in the impacts of Native Load commitments"

- Impact of Ancillary Services not included already in TRM, is very difficult to quantify and include in ETC.

R18

- Non-Firm ETC calculations use the same base flow based on resources serving native load commitments as Firm ETC Calculations. Non-Firm NITS Reservations (second bullet point) are only explicitly incorporated in ETC if they cross control area boundaries (POR not equal to POD). Otherwise they are part of the base-flow calculations.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: Yes, the conversion is described adequately.

In the first bullet point, "...the Transmission Service Provider shall calculate the partial AFC of that..." should be written as "...the Transmission Service Provider shall calculate the partial ATC of that..."

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: R21 and R24

Current tools allow the submission of requests and retrieval of available and calculated AFC and ATC data. It is questionable if that is considered being compliant with R21 and R24. If not, changes to the software might be required to meet the requirements of R21 and R24.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments: Note - We don't have a complete overview of all directives to answer this question.

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments: TSP is the sole entity responsible for performing calculations, and posting of the results. The PC, RC, and TO only submit data to the TSP, such as list of OTDF and PTDF flow gates, seasonal limits of flow gates, flowgate components, flow directions on flowgate components etc. They do not calculate ATC, hence R1 is irrelevant.

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments: No. R15 doesn't meet the intend of paragraph 245. Most of the PtP Reservations don't have specific resources as Source, they typically source from a group of commonly dispatched units. Also most Tariff's allow re-direct of Reservations to different Sources, so excluding Reservations from impact calculations could possibly result in overselling the system if the excluded reservation is re-directed to a different source. It might be possible to make some general guidelines to address the paragraph 245 of Order 890 such as:

- Total sum of Reservations (Confirmed, Approved, Study) impacting a specific corridor, such as a DC tie should not exceed the total capacity of the corridor.
- Total sum of Reservations (Confirmed, Approved, Study) sinking in a Control Area should not exceed the total Load of the Control Area.
- Total sum of Reservations ((Confirmed, Approved, Study) sourcing from a group of commonly dispatched units should not exceed the total available generation capacity of that group of units.

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: We assume the third party is a 1 tier or 2 tier Control Area adjacent to the Tariff footprint of the TSP. Some questions:

- Paragraph talks about impact transmission capability with 3%. Does this mean impact any flow gate within the Tariff footprint of the TSP with 3%. What about flow gates that are tie lines between Tariff footprint and 1tier and limiting element is in 1tier.
- What participation factors and generators should be used to determine if the GLDF of commonly dispatched units of 1tier Control Area is >3%. NERC IDC?
- Is the data listed in bullet point 2,3,4,5,6 of R16 going to be submitted by neighbor TSP. If so it is sufficient to specify that a TSP is getting the list of Reservations as specified in 2,3,4,5,6 of R16 from a neighboring TSP without having to know detail as specified in the bullet points.

9. 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 the conflict in the comments area.

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Yes

No

Comments:

10. 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-030-1.

Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
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NERC Region		Registered Ballot Body Segment
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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 standard drafting team would like to receive industry comments on the proposed requirements and structure of MOD-030-0 Network Response Flowgate ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the 'White Paper' and MOD-030-1 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 "NRFG 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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments:

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: R14:

It is not clear if the standard requires all inputs to be included in the calculation of the impact of Firm ETC. If so, 2 of bullet points are questionable:

- FIRM NITS Reservations (second bullet point) are only explicitly incorporated in ETC if they cross control area boundaries. (POR not equal to POD) Otherwise they are part of the base-flow calculations, DNR's serving Native Load. (first bullet point). Maybe add to second bullet: not otherwise included in TRM or CBM or in the impacts of Native Load commitments of first bullet point.
- Impact of Ancillary Services not included already in TRM, is very difficult to quantify and include in ETC.

R18

- Non-Firm ETC calculations are using same base flow based on Resources serving Native Load commitments as Firm ETC Calculations. The base flow calculations don't make a distinction between Non-Firm or Firm, only if part of the Native Load is supplied by DNR from outside the Control Area. Non-Firm NITS Reservations (second bullet point) are only explicitly incorporated in ETC if they cross control area boundaries. Otherwise they are part of the base-flow calculations.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: Yes, conversion described adequate.

- Partial AFC should be partial ATC in first bullet point.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: R21 and R24

Current tools allow to submit test requests and get AFC and ATC data available. It is questionable if that is considered being compliant with R21 and R24. If not, changes to software are required to meet the requirements of R21 and R24.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments: Note - Don't have a complete overview of all directives to answer that question. This is time intensive!!!!

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments: TSP is responsible to perform calculations, and post the results, the PC and RC and TO only submit data to TSP, such as list of flow gates, limits of flow gates. They do not calculate ATC, hence R1 is irrelevant.

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments: No R15 doesn't meet the intend of paragraph 245. Most of the PtP Reservations don't have specific resources as Source, they typically source from a group of commonly dispatched units. Also most Tariff's allow re-direct of Reservations to different Sources, so excluding Reservations from impact calculations could possibly result in overselling the system if the excluded reservation is re-directed to a different source. It might be possible to make some general guidelines to address the paragraph 245 of Order 890 such as:

- Total sum of Reservations (Confirmed, Approved, Study) impacting a specific corridor, such as a DC tie should not exceed the total capacity of the corridor.
- Total sum of Reservations (Confirmed, Approved, Study) sinking in a Control Area should not exceed the total Load of the Control Area.
- Total sum of Reservations ((Confirmed, Approved, Study) sourcing from a group of commonly dispatched units should not exceed the total available generation capacity of that group of units.

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: We assume third party is a 1 tier or 2 tier Control Area adjacent to the Tariff footprint of the TSP. Some questions:

- Paragraph talks about impact transmission capability with 3%. Does this mean impact any flow gate within the Tariff footprint of the TSP with 3%. What about flow gates that are tie lines between Tariff footprint and 1tier and limiting element is in 1tier.
- What participation factors and generators should be used to determine if the GLDF of commonly dispatched units of 1tier Control Area is >3%. NERC IDC?
- Is the data listed in bullet point 2,3,4,5,6 of R16 going to be submitted by neighbor TSP. If so it is sufficient to specify that a TSP is getting the list of Reservations as specified in 2,3,4,5,6 of R16 from a neighboring TSP without having to know detail as specified in the bullet points.

9. 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 the conflict in the comments area.

Yes

Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

No

Comments:

10. 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-030-1.

Comments:

Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Brian Thumm	
Organization:	ITC	
Telephone:	248-374-7846	
E-mail:	bthumm@itctransco.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input checked="" type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Background Information

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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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: ITC agrees with the requirements, themselves, but disagrees with the responsible entities. The Transmission Owner and/or Transmission Operator should be responsible for determining all limits (thermal, voltage, stability) of the transmission facilities. The TO/TOP may choose to delegate the activities, but the requirements in this Standard have put the responsibility on the wrong entity. The RC should not be involved in the determination of facility limits unless so designated to do so. R4 and R5 are appropriate in that respect, but the others are not. As a Transmission Owner/Operator, ITC would be object to any rating greater than one we would provide. This is a dangerous possibility as currently written particularly if commercial interests could affect reliability considerations.

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: It is not clear that any "allocations" of flowgate capacity, such as in the MISO/PJM Seams agreement, are covered here. These allocations, while technically covered by the 2nd to last bullet, need to be addressed by stronger language than a blanket "any other agreements" clause.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: The conversion of AFC to ATC is covered, but it is not clear. The original SAR for this standard included a white paper with appropriate conversion formulae. Please consult and include the translation equations.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: A ridiculous amount of paper or web space will be used if all ATC path values are posted for large footprints. Flowgates can be in the thousands but ATC paths are quadratic functions of the number of Sources/Sinks (ie, too many paths to print). ATC for a given path should be on request. (i.e., ask for the path and the TSP provides that specific path ATC via

OASIS). This should be either through manual entry by the requestor or electronically via a requestor electronic query tool (i.e., computer program query).

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments:

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments: Applicable Entity 4.2 is not appropriate. Reliability Coordinators should not be calculating ATC. According to the Functional Model, ATC Calculations are performed by the Transmission Service Provider (Task #2, "Determine and post available transfer capability values.") R4 and R5 identify the TO and TP as responsible entities, and need to be included in the applicability sections.

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments: It meets the intent but is subject to potential adverse interpretation. It is true that a POR may not exceed Pmax for the installed generation; however, when multiple requests are received for the POR that exceed Pmax, should the requests be taken first-come-first-served until Pmax is reached? Should the worst-case scenario be studied and used to set limits? Should the requests be pro-rated until the sum of the requests is reduced to Pmax? We believe the TSP should be allowed some leeway in how they model these situations, in order to prevent reliability problems.

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: This is overdue in our estimation. Using 5%, as some have done, has resulted in unnecessary TLRs, particularly on lower voltage (138kV and below) systems.

9. 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 the conflict in the comments area.

Yes

No

Comments: There are 3 methods, pick the one that works. We have noted in our other comments that some entities, such as New England, have approved tariffs that don't require the sale of transmission service. They should not have to pick any method but should, as we have noted, be required to provide data to neighboring TSPs that do sell transmission service.

10. 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-030-1.

Comments: We think this is a much better standard than MOD-028 and -029. It should provide for greater flexibility and reliability. We think all methods should be examined closely if there is

any evidence of overselling (as evidenced by TLRs and market congestion) or underselling (as evidenced by denial of service without TLRs or market congestion).

Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

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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	
Telephone:	515 252 6737	
E-mail:	ddkimm@midamerican.com	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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/ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/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 modeling standards 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 standard drafting team would like to receive industry comments on the proposed requirements and structure of MOD-030-0 Network Response Flowgate ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the 'White Paper' and MOD-030-1 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 "NRFG 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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: The functional model doesn't necessarily translate to reality so this is hard to answer.

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments:

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments:

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments:

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments: Standard is a fill-in-the-blank

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments:

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments: The words meet the intent of the order, but the order may not be technically correct, nor consistent with other OATT requirements.

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: If is this appropriate for MOD-30, it is appropriate for MOD-28. Why do you specifically spell out a requirement for MOD-30 but not MOD-28?

9. 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 the conflict in the comments area.

Yes

No

Comments: This standard is not requiring consistency per the requirement of FERC Order 890.

10. 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-030-1.

Comments: This MOD should be combined with MOD-28 and everyone using a distribution factor based analysis should use the same methodology and the amount of consistency should be increased significantly.

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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
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
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Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: For R6, R8, R9, R10, R11 the responsible entities described are incorrectly based upon the assumption that all NERC members are members of an RTO. These requirements should be revised in this regard to provide that "the Transmission Service Provider, the Reliability Coordinator, and/or the Planning Coordinator, as appropriate", do these requirements in the standard. Further R1 and R2 should also be revised for this reasons to also refer to the "Transmission Service Provider, the Reliability Coordinator and/or the Planning Coordinator, as appropriate."

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: 1. R1.1, R3, R11 and other requirements that indicate that the results are to be made available publicly should indicate that these results should be made available publicly "on the OASIS" so that this information is not made publicly without registration. 2. R14 should be revised to indicate that "The Transmission Service Provider shall determine the impact of firm ETCs based on "an appropriate level of " the following inputs. 3. R16 the impacts by more than 3% are consistent with post-contingent flowgates. It should be noted that there are continuing to exist in the area, pre-contingent flowgates which would be improperly represented by post-contingent flowgates. The pre-contingent flowgates in the area generally only consider significant third-party impacts that are at 5% or more. Therefore, provisions should be made in R16 to allow the appropriate screen, 3% or 5%, for the appropriate type of flowgate, post-contingent or pre-contingent. 4. R18 should be expanded to include the use of metered data to forecast non-firm ETC in the operating horizon and therefore, allowing the release of non-firm ETC for non-firm ATCs in the operating horizon. This method is being used in the area to maximize the non-firm offerings in the operating horizon. I suggest wording such as the following for R18 or as a subrequirement: "Forecasts of non-firm ETC may be made using metered data so as to allow the release of non-firm ETC in the operating horizon. When such forecasting methods are used, it may be assumed that reductions in metered flows in the operating horizon are due to reductions in non-firm ETC." 5. Either use existing transmission commitments in lower case or else provide a definition for the NERC Glossary.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: The R22 is inadequate in describing what must be done. It is unclear what path the flowgates are to be converted to. Are the flowgate quantities to be converted into equivalent

control area to control area path quantities? Are the flowgate quantities to be converted into flowgate path quantities? If it is the latter, what are the definitions and purposes of the flowgate path quantities? In addition, I do not understand what the benefits are in converting Flowgate AFCs to path AFCs. It seems to be an unnecessary and confusing requirement albeit one in FERC Order 890.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: It will be incredibly confusing posting both AFCs and ATCs for the same transmission service. I agree that this is in accordance with the FERC Order 890; however, I do not understand what the benefits of this conversion to open transmission service and reliability. I ask the SDT to clarify.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments:

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments: It is not appropriate to qualify the Functional Entity as provided in A.4.1 through A.4.3, that is, A.4.1 through A.4.3 should just list the NERC functions from the NERC functional model and not qualify it. For example, 4.1 should be "Planning Coordinator" not "Each Planning Coordinator that uses the Flowgate Network Response method to calculate.....". Then it is up to Planning Coordinators etc. to review the standard to see how the requirements are to be applied, if at all.

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Yes

No

Comments: The words seem to meet the requirement although developing a process which meets the requirement is very difficult to do. Also, this requirement is a transmission service request evaluation process requirement and does not belong in its present form in a standard concerning ATCs calculation. Also, there are issues with implementing this requirement. When there are numerous point to point requests for transmission service where some of them are partial path requests, it is not clear how to enforce the impacts of all transmission service shall not exceed the source at a particular point. If the Standards Drafting Team intends to continue with this requirement, the Standards Drafting Team should outline some subrequirements which explain how the Transmission Service Provider is to do this. It would be helpful if the SDT would develop an example of multiple requests some of which are partial path requests to the source point where subsequent requests will result in power being moved away from the point and show how the Transmission Service Provider then reviews the impacts to meet the requirement.

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No

Comments: The impacts by more than 3% are consistent with post-contingent flowgates. It should be noted that pre-contingent flowgates are continuing to exist in the area. Such pre-contingent flowgates have physical conditions that would be improperly represented by post-contingent flowgates so the pre-contingent flowgates must remain in place. The pre-contingent flowgates in the area generally only consider significant those third-party impacts that are at 5% or more. Therefore, provisions should be made in R16 to allow the appropriate screen, 3% or 5%, for the appropriate type of flowgate, post-contingent or pre-contingent.

9. 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 the conflict in the comments area.

Yes

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Comments:

- 10.** 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-030-1.

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Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Michelle Rheault	
Organization:	Manitoba Hydro	
Telephone:	204-487-5445	
E-mail:	mdrheault@hydro.mb.ca	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input checked="" type="checkbox"/> MRO	<input checked="" type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input checked="" type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input checked="" type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

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 Capability (TTC)/Available Transfer Capability (ATC)/Available Flowgate Capability (AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/ATC/AFC calculation and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/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/ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/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 modeling standards 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 standard drafting team would like to receive industry comments on the proposed requirements and structure of MOD-030-0 Network Response Flowgate ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the 'White Paper' and MOD-030-1 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 "NRFG 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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments:

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments:

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: I don't believe there should be a conversion it only leads to uncertainty. I believe that the committee should be able to standardize on one technique.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments:

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

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Comments:

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No

Comments:

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Yes

No

Comments:

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: During a TLR or redispatch, a 3% cutoff would require the third party to adjust their resources by up to 33 MW for every 1MW of relief. I believe that this is too much. I would recommend third party mitigation has to be a balance of impact and ability for relief and that 3% biases that balance. I would recommend that the 5% impact which still requires a potential 20 MW adjustment for every 1 MW of relief maintains the balance between impact and ability for relief.

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Comments:

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Comments:

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
E-mail:		
NERC Region		Registered Ballot Body Segment
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<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: The MRO believes that for R6, R8, R9, R10, R11 the responsible entities described are incorrectly based upon the assumption that all NERC members are members of an RTO. These requirements should be revised in this regard to provide that "the Transmission Service Provider, the Reliability Coordinator, and/or the Planning Coordinator, as appropriate", do these requirements in the standard. Further R1 and R2 should also be revised for this reasons to also refer to the "Transmission Service Provider, the Reliability Coordinator and/or the Planning Coordinator, as appropriate."

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: 1. R1.1, R3, R11 and other requirements that indicate that the results are to be made available publicly should indicate that these results should be made available publicly "on the OASIS" so that this information is not made publicly without registration. 2. R14 should be revised to indicate that "The Transmission Service Provider shall determine the impact of firm ETCs based on "an appropriate level of " the following inputs. 3. R16 the impacts by more than 3% are consistent with post-contingent flowgates. It should be noted that there are continuing to exist in the MRO area, pre-contingent flowgates which would be improperly represented by post-contingent flowgates. The pre-contingent flowgates in the MRO generally only consider significant third-party impacts that are at 5% or more. Therefore, provisions should be made in R16 to allow the appropriate screen, 3% or 5%, for the appropriate type of flowgate, post-contingent or pre-contingent. 4. R18 should be expanded to include the use of metered data to forecast non-firm ETC in the operating horizon and therefore, allowing the release of non-firm ETC for non-firm ATCs in the operating horizon. This method is being used in the MRO to maximize the non-firm offerings in the operating horizon. The MRO suggests wording such as the following for R18 or as a subrequirement: "Forecasts of non-firm ETC may be made using metered data so as to allow the release of non-firm ETC in the operating horizon. When such forecasting methods are used, it may be assumed that reductions in metered flows in the operating horizon are due to reductions in non-firm ETC." 5. Either use existing transmission commitments in lower case or else provide a definition for the NERC Glossary.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: The MRO believes that the R22 is inadequate in describing what must be done. It is unclear what path the flowgates are to be converted to. Are the flowgate quantities to be

converted into equivalent control area to control area path quantities? Are the flowgate quantities to be converted into flowgate path quantities? If it is the latter, what are the definitions and purposes of the flowgate path quantities? In addition, the MRO does not understand what the benefits are in converting Flowgate AFCs to path AFCs. It seems to be an unnecessary and confusing requirement albeit one in FERC Order 890.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: It will be incredibly confusing posting both AFCs and ATCs for the same transmission service. The MRO agrees that this is in accordance with the FERC Order 890; however, the MRO does not understand what the benefits of this conversion to open transmission service and reliability. The MRO asks the SDT to clarify.

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Yes

No

Comments:

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

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Comments:

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Yes

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3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

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No

Comments:

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

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<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
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<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

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
Contact Telephone: 704-948-0761
Contact E-mail: jtroha@serc1.org

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 Electric and 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		

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 Capability (TTC)/Available Transfer Capability (ATC)/Available Flowgate Capability (AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/ATC/AFC calculation and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/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/ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/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 modeling standards 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 standard drafting team would like to receive industry comments on the proposed requirements and structure of MOD-030-0 Network Response Flowgate ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the 'White Paper' and MOD-030-1 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 "NRFG 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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: see answer to #6.

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments:

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: The definition provided in the SAR was clearer than the current definition. The new definition introduces new terms into the process that are not industry standard or recognizable.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments: Posting the AFC numbers provide no additional value if the ATC numbers are posted.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments:

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments: The applicability section needs clarification. Referencing R1,6,8,9 and 10 they should apply only to those entities performing the function. The standard should not require the calculations be made by the PC and RC, but should be applicable to the designated entity performing these calculations. The designated entity must be specified as a requirement in this standard. For example: The TSP, PC and RC must specify and agree to the entity that performs this function in the TSP's ATCID as required in MOD 1. The current revision of MOD-001 states the following requirement as R1: "Each Transmission Service Provider, and its associated Planning Coordinators and Reliability Coordinators, shall agree upon and implement one or more of the ATC methodologies specified in Reliability Standard MOD-028, MOD-029, and MOD-030 for use in determining Transfer Capabilities of those Facilities under the tariff administration of that Transmission Service Provider." The requirements of MOD-0028 should refer to the Designated Entity specified through this requirement. The following are examples of how this would be implemented in the standard:

B. Requirements

R4. Each Designated Entity shall ensure that the Total Transfer Capability (TTC) for each of its Transmission Service Provider's POR to POD Paths is calculated and up-to-date for use within the Transfer Capability time horizons specified in MOD-001 R2.

R5. Prior to calculating TTC, each Designated Entity shall update the following components of the base case power flow model it uses to calculate TTC for the time horizon being studied:

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments:

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments:

9. 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 the conflict in the comments area.

Yes

No

Comments:

10. 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-030-1.

Comments: The updating of flowgates as specified in Requirement 2 should be annually rather than quarterly.

Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

Please use this form to submit comments on the 1st draft of standard MOD-030-1 Network Response Flowgate ATC. Comments must be submitted by **June 24, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.net with "NRFG 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:	W. Shannon Black Et Al ; Sacramento Municipal Utility District	
Organization:	Sacramento Municipal Utility District	
Telephone:	(916) 732-5734	
E-mail:	sblack@smud.org	
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
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<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input checked="" type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations and Regional Entities

Comment Form — 1st Draft of Standard MOD-030-1 Network Response Flowgate ATC (Project 2006-07)

*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 Capability (TTC)/Available Transfer Capability (ATC)/Available Flowgate Capability (AFC). Project 2006-07 requires that specific reliability practices be incorporated into the TTC/ATC/AFC calculation and coordination methodologies and adds requirements for documentation of the methodologies used to coordinate TTC/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/ATC/AFC is evaluated, as well as providing greater transparency about how a transmission provider calculates and allocates TTC/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 modeling standards 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 standard drafting team would like to receive industry comments on the proposed requirements and structure of MOD-030-0 Network Response Flowgate ATC. Once there is consensus on the requirements, the drafting team will add measures and compliance elements. Please review the 'White Paper' and MOD-030-1 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 "NRFG 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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments: "Planning Coordinator" is not a defined term. Pleae correct.

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments: The impact of load growth for Network Integration Transmission Service should be included in the second sub-bullet of R14.

The "five years or longer in duration" language should be removed from the fifth sub-bullet of R14. due to the fact that this element of Order 890 is only to be implemented by a TSP once the FERC has approved the TSP's Attachment K -- this may not occur for some TSPs until after the standards are to be implemented. Additionally, regardless of whether a TSP's Attachment K is approved, there will be a transition period (to be developed by each TSP) from the old 1-year/60-day roll-over paradigm to the 5-year/1-year -- the standard should not preclude a TSP from encumbering capacity for those exisitng Customers who have not yet been required to commit to five years of service to retain their roll-over rights.

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments: No comment.

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments:

(The below statement is proposed by BPA. Is the WECC Team OK with supporting it?)

Under the flowgate methodology, ATC is a value derived from an analysis of the expected powerflow impacts of a reservation across multiple flowgates. Consequently, it is the posting of AFC and timely posting of changes to AFC that inform whether transfer capability exists to support a request for transmission service. ATC for a POR-POD path is derived from posted AFC. When posting both ATC by path as well as AFC by flowgate, there is a risk that the AFC and ATC values could get "out of sync" due to automation lag-time, etc. BPA believes 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 AFC's.

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments: No comment.

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments: See above on defining Planning Coordinator.

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments:

8. Do you agree with the 3% specified in R16 for including third party impacts? If "No," please specify what percent or alternate approach should be used and explain why in the comment area below.

Yes

No

Comments: The threshold of 3% appears to be an arbitrary level. This level may be rooted in Operational and Planning studies that consider impacts from outages on one TP's system that increase loading on an element of another TP's system by 3% or more. While this level may be a good indicator of impact, it may not provide an indicator of which party's ownership or allocation of facilities is being used. It does not assure TPs will be able to preserve their rights (i.e. by contractual allocation) with a fixed threshold of 3%.

9. 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 the conflict in the comments area.

Yes

No

Comments:

10. 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-030-1.

Comments:

A.

R1.2 should be modified due to the fact that Facilities don't cause congestion, rather they experience congestion. The following change to the language would be more accurate:

"How the methodology identifies transmission Facilities that are expected by the AFC calculator to experience congestion on the transmission system."

B.

See comments on MOD-29.

In the "Applicability" section, the term "Available Transfer Capability Implementation Document" is used as a defined term. The term is used in MOD-01 R3. At minimum the ATCID either needs to be defined or a reference to the MOD-01 must be inserted for cross reference.

C.

R.1 through R.3. appear to be a prohibited "fill-in-the-blank."

D.

R22. Typo. Change "covert" to "convert."

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Individual Commenter Information		
(Complete this page for comments from one organization or individual.)		
Name:	Chuck Falls	
Organization:	Salt River Project	
Telephone:	602 236-0965	
E-mail:	Chuck.Falls@srpnet.com	
NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input checked="" type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input type="checkbox"/>	2 — RTOs and ISOs
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
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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. Do you agree with the responsible entities described in Requirements four through seven and eleven (R4-R7 and R11)? If "No," please explain why in the comments area.

Yes

No

Comments:

2. Do you believe that all elements of ETC have been adequately captured in Requirements fourteen and eighteen (R14 and R18)? If "No," please explain why in the comments area.

Yes

No

Comments:

3. Is the conversion of AFC to ATC adequately described in Requirement twenty-two (R22)? If "No," please explain why in the comments area.

Yes

No

Comments:

4. Do you anticipate any problems with posting both AFCs and ATCs as described in Requirements twenty-one and twenty-four (R21 and R24) in this draft standard? If "Yes," please explain why in the comments area.

Yes

No

Comments:

5. The drafting team attempted to address all of the directives identified in the Federal Energy Regulatory Commission's (FERC) Orders 890 and 693 related to AFC, as it relates to ATC. Do you agree that the drafting team has adequately responded to all of FERC's directives in FERC Orders 890 and 693 related to AFC in this draft of MOD-030-1? If "No," please explain why in the comments area.

Yes

No

Comments:

6. Do you agree with the functional entities identified in the "Applicability" section of the draft standard? If "No," please identify the functional entities to whom you believe the standard should apply and why.

Yes

No

Comments:

7. In R15, we provided a preliminary response to Order 890s paragraph 245, which deals with reservations that have the same POR (generator) but different PODs (loads). Do you agree that R15 meets the intent of order 890? If "No," please suggest how you believe the Order's requirements from paragraph 245 should be addressed in the comments area.

Yes

No

Comments:

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Yes

No

Comments:

9. 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 the conflict in the comments area.

Yes

No

Comments:

10. 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-030-1.

Comments:

The standard should describe how flowgates and reliability limits should be determined such as is done for the Network Response Methodology MOD028 in requirement R6 and is done for the Rated System Path Methodology MOD029 in requirement R6.

Requirements R1.1, R1.2 & R1.3 are fill-in-the-blank requirements and need to specify rather than ask the tsp to explain what they do.

R8 - The standard should specify how the thermal, voltage and stability limited are determined. For example, are these n-0 or n-1 limits and are they transient or post-transient?

