Consideration of Comments on Initial ballot of MOD-030-2 — Flowgate Methodology (Project 2006-07 — ATC/TTC/AFC and CBM/TRM Revisions)

Summary Consideration: The drafting team did not make any changes to the standard based on comments received.

One balloter suggested that the "Time Horizon" for some of the requirements should include Long-Term Planning. The SDT responded that Short Term transfers are evaluated for a "yes" or "no" answer based on pre-calculated capacities. Long Term transfers are studied on demand and studied from the perspective of finding a way to serve the transfer. Because of these differences the SDT does not believe it is prudent to include criteria on long term transfers in this standard, since the standard addresses the fundamentally different short term transfers or more accurately the calculation of the capacities used to approve or refuse a transfer.

Some balloters expressed concern that the standard conflicts with the manner in which the Midwest ISO has implemented the flowgate methodology today. The SDT has informed those commenters that if they believe their current method is reliable and meets or exceeds the intent of the standard, they can submit a SAR requesting a Variance, ask for a Joint Registration Organization (JRO), or pursue other contractual or delegation options. If a SAR is submitted, then NERC can work with the balloters to develop an acceptable solution.

Some balloters expressed that the model requirements in R3 were excessive, and may be unnecessary if a flowgate has not been defined within the Transmission Operator's area. The SDT explained that the requirement is necessary for the Transmission Operator to supply the models with the initial loads, topology and ratings. While it would also be valid to have one requirement for the Transmission Operator to supply changes, and a separate requirement for the Transmission Service Provide to implement them, the SDT chose a different approach and industry did not seem to object. Note that this language is the same as in the current MOD-030-1; it was not changed during this drafting effort. The SDT does not believe it is appropriate to assume that if there are no flowgates defined in the Transmission Operator's area, then there is no need to ensure that the model is up to date and accurate, At a minimum, the impact of operations within the modeled area may have impacts on other areas in which flowgates are defined. As such, it is important that both models be accurate and up to date.

One balloter appeared to express concerns regarding the disclosure of information to market participants. The SDT believes that it has addressed the reliability aspects of access; to the extent other entities need access to the same data, NAESB will be addressing such requirements.

Entity	Segment	Vote	Comment

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Ameren Services	1	Negative	Standard only refers to "short-term" use. We believe that the AFC issues affect long-term Planning as well as Operations (short term) Planning. There needs to be consistency among the methodology used for shorter term and longer term sales. Therefore, the standard should include requirements related to longer-term also.

Response: In general, analysis of Short Term requests are based on available capacity on paths or flowgates and take into account only existing facilities and currently planned facilities. A particular request is not studied but instead a capability of paths is determined and transfers allowed if the capability is there. The decision made with regard to Short Term requests is to allow the transfer or not allow the transfer and the decision is made by the TSP, not by the requestor.

Long Term transfers are studied individually and specifically, not measuring available capacity, but instead by modeling the transfer and determining if it causes problems. Situations where existing facilities can not support a transfer and would result in a refusal in short term, are instead evaluated to determine if there are solutions (typically transmission projects) that can be constructed in a particular time frame to accommodate the transfer.   The decision with regard to Long Term requests is made by the requestor and is whether to take the service and pay for any needed upgrades.

This results in a fundamental difference between analyses of short term and longer term transfers. Short Term transfers are evaluated for a yes or no answer based on pre-calculated capacities. Long Term transfers are studied on demand and studied from the perspective of finding a way to serve the transfer.

Because of these differences the SDT does not believe it is prudent to include criteria on long term transfers in this standard, since the standard addresses the fundamentally different short term transfers or more accurately the calculation of the capacities used to approve or refuse a transfer.

Note that specific practices may vary from region to region.

Entity	Segment	Vote	Comment
Consolidated Edison Co. of New York	1	Affirmative	FYI - A "yes" vote was recommended by the NPCC Regional Standards Committee (RSC) to members under Chair Guy Zito.

Response: Thank you for your vote and comment.

Entity	Segment	Vote	Comment
FirstEnergy Energy Delivery First Energy Solutions	1, 3, 5, 6	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed version 2 MOD-030 Flowgate Methodology standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. The changes made in the proposed balloted version do not address our prior raised concerns of the version 1 standard. During the commenting period for the SAR that provided the work scope for this balloted version, FE asked the drafting team to work with MISO and its members to develop an Entity Variance for the MISO

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			footprint. The team chose not to adjust its work scope and indicated a separate SAR would be needed. FE is currently working with MISO to address our concerns with the MOD-030 standard, as well as the companion MOD-001, MOD-004 and MOD-008 standards. An Entity Variance is one of the options being considered and if deemed the appropriate step towards resolving our concerns we will work through MISO to submit a SAR.
Response: The SDT appreciates your comments, and if a SAR requesting a Variance is submitted, will work with First Energy and MISO to develop a solution. Note that other options include asking for JRO status or pursuing other contractual or delegation options.			
ITC Transmission	1	Negative	Based on concerns with the applicability statement and the difficulties of efficiently and effectively implementing the proposed standard within the Midwest ISO, ITC is voting negative.
Response: The SDT appreciates your comments, and if a SAR requesting a Variance is submitted, will work with First Energy and MISO to develop a solution. Note that other options include asking for JRO status or pursuing other contractual or delegation options.			
Orlando Utilities Commission	1	Abstain	OUC currently does not use the flow gate method, I am abstaining at this time and will consider the comments received by the team and their response to determine my vote on the second round.
Response: Thank you.			
Tucson Electric Power Co.	1	Abstain	Does not apply to TEP.
Response: Thank you.			
Alberta Electric System Operator	2	Abstain	Alberta does not use the Flowgate methodology.
Response: Thank you.			
Lincoln Electric System	3, 5, 6	Negative	Requirement R3 states- "The Transmission operator shall make available to the Transmission Service Provider a Transmission model to determine Available Flowgate Capability (AFC) the meets the following criteria:" Then spells out defining transmission models one for each day for 30 days, 12 monthly etc. This requirement seems overly complicated as the Transmission Service Provider should have the topology and ratings. All the Transmission Operator should have to supply to the Transmission Service Provider are changes to topology or ratings, expected loads and expected generation for the required periods. Even this seems superfluous if there are no flowgates in the Transmission operators area.
Response: This requirement is necessary for the Transmission Operator to supply the models with the initial loads, topology and ratings. While it would also be valid to have one requirement for the Transmission Operator to supply changes, and a separate requirement for the Transmission Service Provide to implement them, the SDT chose a different approach and industry did not seem to object. Note that this language is the same as in the current MOD-030-1; it was not changed during this drafting effort. The SDT does not believe it is appropriate to assume that if there are no flowgates defined in the Transmission Operator's area, then there is no			

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			need to ensure that the model is up to date and accurate, At a minimum, the impact of operations within the modeled area may have impacts on other areas in which flowgates are defined. As such, it is important that both models be accurate and up to date.
Orlando Utilities Commission	3	Abstain	We do not use this method. I will consider the support/comments received on this vote to determine my vote in the next round.
Response: Thank you.			
Ohio Edison Company	4	Negative	FirstEnergy Corp. (FE) appreciates the hard work put forth by the NERC ATC/CBM/TRM standard drafting team (SDT). However, based on difficulties of efficiently and effectively implementing the proposed version 2 MOD-030 Flowgate Methodology standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. The changes made in the proposed balloted version do not address our prior raised concerns of the version 1 standard. During the commenting period for the SAR that provided the work scope for this balloted version, FE asked the drafting team to work with MISO and its members to develop an Entity Variance for the MISO footprint. The team chose not to adjust its work scope and indicated a separate SAR would be needed. FE is currently working with MISO to address our concerns with the MOD-030 standard, as well as the companion MOD-001, MOD-004 and MOD-008 standards. An Entity Variance is one of the options being considered and if deemed the appropriate step towards resolving our concerns we will work through MISO to submit a SAR.
Response: The SDT appreciates your comments, and if a SAR requesting a Variance is submitted, will work with First Energy and MISO to develop a solution. Note that other options include asking for JRO status or pursuing other contractual or delegation options.			
Constellation Generation Group	5	Abstain	These standards do not adequately address access to the "Identification Documents" which guide what and how the data is used to comply with the standards. We understand NAESB will be taking that issue on? However, since this remains a gap today, it is difficult to vote for this standard.
Response: The SDT believes that it has addressed the reliability aspects of access; to the extent other entities need access to the same data, you are correct: NAESB is the correct forum addressing such requirements. The NAESB Business Practice related to this item is WEQ-001-13.1.5.			
Orlando Utilities Commission	5	Abstain	We do not use the Flow Gate method for calculating ATC. I am abstaining at this time and will consider the comments received by the team and their responses to determine my vote on the second round.
Response: Thank you.			
MidAmerican Energy Co.	6	Affirmative	It is unfortunate the other two methodologies aren't as detailed as this one.
Response: Thank you for your vote and comment.			
Florida Reliability Coordinating Council	10	Abstain	We do not use the Flow Gate method

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Response: Thank you.			