

Consideration of Comments on Initial Ballot — MOD-001-1 — Available Transmission System Capability

Summary Consideration: While some stakeholders suggested modifications to the standard, most stakeholders agreed with the standard as proposed and the drafting team did not make any changes to the standard.

Entity	Segment	Vote	Comment
Ameren Services Company	1	Negative	Ameren would like to thank the SDT for the considerable effort invested in drafting this standard. However, Ameren cannot support this version of MOD-001-1. Under R1, the Transmission Service Provider not the Transmission Operator should be responsible for selection of the ATC/AFC methodology. This is especially true when the Transmission Service Provider determines ATC for the transmission systems of several Transmission Operators as would occur in an RTO/ISO such as the MISO. R5 suggests that the Transmission Operator is responsible to calculate TTC or TFC. This is not supported by the current version of the Functional Model. Determining TTC (TFC) is a planning function supported by the Transmission Planner. The majority of requirements are limited to the Operations Planning Time Horizon. TTC (TFC) and ATC (TFC) are also parameters which are relevant in the plus one year.
<p>Response: The Functional Model does not attribute the determination of TTC to any entity. As such, the SDT was required to interpret the model to determine the appropriate entity for determining TTC and selecting the methodology. Since the ratings of facilities are established by the Transmission Operator, the SDT felt it appropriate to assign the responsibility for TTC to the Transmission Operator. Since TTC is determined prior to ATC, the SDT felt the Transmission Operator would be the appropriate entity to select the methodology. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established.</p> <p>The SDT agrees that some entities may choose to address TTC/TFC and ATC/AFC beyond the first year, the SDT has elected to remain consistent with the previous version of the standards and not address more than the first 13 months in this version.</p>			
American Electric Power	1	Negative	AEP would have voted affirmatively for this standard had seemingly minor clarifications been included. This negative vote is for the following reasons: This standard, as written, has largely divorced itself from the previous references of ATC and its connection to 'selling' unused transmission 'capacity'. And, as such, the Purpose section in this proposed standard presupposes that these calculations are to be (or is being) done and are necessary for reliability. The purpose clearly states "To ensure calculations are performed to maintain awareness of available transmission capability and future flows...." This is simply not the case for a large portion of the bulk electric system. As an example, ERCOT does not have any "ATC paths" internal to ERCOT and therefore does not calculate ATC for the transmission system internal to ERCOT. However, the proposed revision to MOD 001 does not clearly state where (which paths) ATC must be calculated or where it should not (or need not) be calculated. Although one could assume that ATC is not intended to require ATC calculations for "internal

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			<p>Paths" -- the standard is less than clear in this regard. However this proposed Standard requires that each Transmission Operator (per R1) select a method a method of calculation "for each ATC path for those Facilities within its Transmission operating area" , strongly implies or at least allows a far more reaching, unnecessary and burdensome interpretation.</p> <p>In addition, the definition of ATC Path states ..."any combination of POR and POD for which ATC is calculated and any Posted Path." And the definition of ATC states — measure of transfer capability remaining in the physical transmission network for further commercial activity..." It is unclear how to interpret "further commercial activity" in a market such as ERCOT's. (ERCOT does not 'sell' transmission service). This alone could cause unwarranted concern, or needless ambiguity during implementation of this standard or some future audit -- and/or necessitates creation of a regional standard.</p> <p>The standard is also internally inconsistent. The Purpose presupposes that the calculation is being (or needs to be) performed. R1 requires that "Each Transmission Provider" must select a methodology. The standard does not define for which PRO/POD pairings (ATC Paths) ATC must be calculated. However, for existing tariff and other reasons, ATC is not currently be calculated for a large portion of the bulk electric system. It is unclear if this standard will now require ATC to be calculated where it is currently not being and not needed to be calculated. Much of the dismay of this proposed standard could have been mitigated by adding the clarification — that this standard (or the calculation of ATC) does NOT pertain to any POR/POD pairings internal to a particular Transmission Service Provider (or Balancing Authority) but rather between two or more synchronously connected 'neighbors'. Without this clarification, we believe that there is a high risk of unintended consequences, and therefore, must vote against</p>
<p>Response: The SDT believes that where internal paths are made available for third party use, these standards are appropriate, provided that path either 1.) meets the FERC definition of Posted Path, or 2.) is currently analyzed on a POR to POD basis. The SDT recognizes the concerns expressed by AEP relative to the ERCOT system, and notes that if AEP or ERCOT would like more certainty regarding the applicability of the standard, ERCOT can pursue a Regional Variance on an Interconnection-Wide basis through the NERC-approved Texas Regional Entity (TRE) process.</p>			
Brazos Electric Power Cooperative, Inc.	1	Negative	<p>Brazos votes NEGATIVE for this standard as written as it imposes obligations on entities in the ERCOT region that do not utilize ATC paths and calculation methodologies to manage congestion or for reliability operations. Our previous submitted comments suggested that applicability language be included in requirement R1 to recognize that such market difference exists.</p>
<p>Response: The SDT recognizes the concerns expressed by Brazos Electric Power Cooperative relative to the ERCOT system, and notes that if Brazos or ERCOT would like more certainty regarding the applicability of the standard, ERCOT can pursue a Regional Variance on an Interconnection-Wide basis through the NERC-approved TRE process.</p>			
CenterPoint	1	Negative	<p>CenterPoint Energy has previously commented to the ballot pool that we do not support this</p>

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Energy			standard until the standard is clarified. In the interest of brevity, CenterPoint Energy will not repeat its earlier comments.
<p>Response: The SDT recognizes the concerns expressed by Centerpoint relative to the ERCOT system, and notes that if Centerpoint or ERCOT would like more certainty regarding the applicability of the standard, ERCOT can pursue a Regional Variance on an Interconnection-Wide basis through the NERC-approved TRE process.</p>			
Exelon Energy	1	Affirmative	<p>General comment These standards bring the industry closer to a unified ATC calculation methodology by requiring that one of three calculation methodologies be utilized and documented. This is an improvement from where the industry is today but falls short of FERC Order No. 890. The standards still lack a requirement for ATC or AFC calculations to be consistent with criteria used in operating and planning studies for corresponding time periods. Exelon's comments reflect these deficiencies and Exelon will be making these same points to FERC if these standards are approved, requesting that the FERC direct NERC to approve the standards but modify the standards to be consistent with Order No. 890. Suggested modifications to the standards to achieve this consistency are included in our comments.</p> <p>MOD-001-1 Available Transmission System Capability The purpose of the standard does align with the requirements specified. There are no requirements that would “ensure that calculations are performed by Transmission Service Providers to maintain awareness of available transmission system capability and future flows on their own systems as well as those of their neighbors”. The following wording is suggested for the purpose:</p> <p style="padding-left: 40px;">To ensure that Available Transmission System Capability calculations performed by Transmission Service Providers are documented and performed using one of the three methodologies specified in this standard.</p> <p>R6 and R7 need to be revised to reflect consistency with both planning and operating studies for corresponding time periods studied. The term “planning of operations” is not a defined term and one that is not commonly used by all electric utility entities. The following wording is suggested for R6 and R7:</p> <p style="padding-left: 40px;">R6. When calculating Total Transfer Capability (TTC) or Total Flowgate Capability (TFC) the Transmission Operator shall use assumptions no more limiting than those used in operating studies and planning studies for the corresponding time period studied.</p> <p style="padding-left: 40px;">R7. When calculating ATC or AFC the Transmission Service Provider shall use assumptions no more limiting than those used in operating studies and planning studies for the corresponding time period studied.</p>

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			In R3 add requirements to specify the following: PTDF and OTDF cutoff values used Source and sink point determination and use
<p>Response: With regard to the purpose, the SDT's intention is that this standard work in concert with the three methodology standards to support the purpose as required in R1.</p> <p>The SDT notes that the "planning of operations" language in R6 and R7 has intentionally been taken directly from Order 890 to ensure consistency with the Commission's intent.</p> <p>The SDT notes that MOD-001 R3.1 already indirectly requires the information suggested. While explicitly requiring the information would be more clear, the SDT does not believe the change to be warranted at this time.</p>			
FirstEnergy Energy Delivery	1	Negative	<p>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 MOD-001 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and its member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-001 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and Attachment C of the MISO Open Access Transmission and Energy Market Tariff. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. As described in the procedure, "Variances should be identified and considered when a SAR is posted for comment. Variances should also be considered in the drafting of a standard, with the intent to make any necessary variances a part of the initial development of a standard. The public posting allows for all impacted parties to identify the requirements of a NERC reliability standard that might require a variance." FE believes it is important to complete and include the MISO variance in conjunction with the drafting of the MOD-001 standard. FE requests the variance to cover TOP tasks as described in the following requirements: - R1: Selection the ATC or AFC methodology - R6: Calculation of TTC or TFC. Additional Comments: R1 â€" Selection of ATC or AFC</p>

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			<p>Methodology(ies): We appreciate the effort taken by the SDT during the last comment period in seeking industry feedback regarding which responsible entity, the Transmission Service Provider (TSP) or Transmission Operator (TOP), should be responsible for selecting the ATC or AFC methodology used to calculate ATC or AFC. In the SDT team's response to industry comments it was indicated that 13 out of 35 responders felt the TSP is the appropriate responsible entity and it was the SDT's opinion that this did not show consensus from the industry to change the SDT's proposed assignment of the requirement to the TOP. However, the SDT failed to recognize that only 7 favored the TOP and that 15 respondents were indifferent to the TSP or TOP being assigned. The SDT's action to keep the TOP as the responsible entity assumes the team was correct in its initial assignment. In reality, the review of data from industry should have been 7 for TOP and 13 for TSP. This is nearly a 2 to 1 response in favor of the TSP selecting the methodology. Therefore, FE believes the SDT failed to make the appropriate adjustment and that the TSP is the appropriate responsible entity for this requirement.</p>
<p>Response: The SDT believes the Functional Model indicates that these requirements are the responsibility of the Transmission Operator. While many entities may have delegated these tasks to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. The SDT believes the transfer of responsibility described within the MISO Transmission Owners Agreement would be an effective way to delegate this task to a Transmission Service Provider through the registration of a Joint Registration Organization. To the extent an entity variance is desired, First Energy and/or MISO would need to submit a SAR to request the variance. The commenter is correct that ideally a variance would be considered in the SAR process and throughout the standard development process; however, no one has yet requested a variance through a SAR (or incorporated the request into one of the existing SARs during their development), and at this time the drafting team can not add a variance and still meet the deadline established by NERC and FERC for this revision of the standard.</p>			
<p>As described in the SDT's responses to comments, there was not a clear majority in support of the Transmission Service Provider. There was a majority (as noted by First Energy) that did not express a preference. Had an overwhelming majority indicated that the Transmission Service Provider was the correct entity, the SDT would have considered a change to the standard. However, we note that no entity provided a clear explanation of why the Transmission Service Provider was the appropriate entity. The SDT acknowledges that some entities stated that their Transmission Service Provider performed the task, and that it was easier for a regional entity to perform the task, but no entity provided support (through the Functional Model or any other means) for why the responsibility should be shifted to the Transmission Service Provider. The SDT also notes that in previous comments, some entities supported the assignment to the Transmission Operator. Accordingly, without a rationale for the change, and with a majority that did not express a preference, the SDT felt a change was unwarranted.</p>			
Great River Energy	1	Negative	Great River Energy (GRE) thanks the NERC ATC/CBM/TRM standard drafting team for all of their efforts in the creation of this standard. However, GRE is concerned with the Transmission Operator being assigned as the responsible entity for R1 and R6 in MOD-001. It is GRE's opinion that the responsible entity for R1 and R6 should be the Transmission Service Provider.
<p>Response: The SDT believes the Functional Model indicates these requirements should apply to the Transmission Operator. While many</p>			

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<p>entities may have delegated these tasks to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established.</p>			
Oncor Electric Delivery	1	Negative	<p>Oncor votes NO on this standard due to continuing objection to applicability. This standard imposes obligations on Transmission Operators and Transmission Service Providers to take actions involving ATC paths and calculation methodologies in physical markets where those methodologies are not used to reliably manage congestion nor are they needed to maintain reliability. For example R1 requires Transmission Operators to select one of three methodologies to calculate something that has no need to be calculated in the ERCOT market and perhaps in other areas as well. This concern has been expressed to the drafting team and they continue to say that the variance process is the way to deal with this concern. In our opinion that is inappropriate behavior for a drafting team. If they know that there is not a reliability need to impose an obligation on certain market participants then the drafting team should do the work to correct that within the standard itself rather than passing the buck to the market participant to do variance work. The drafting team is knowingly imposing a construct that is used in the Eastern Interconnection as the only way to do something when they full well know that there are other methodologies used in other interconnections that are effective at meeting the underlying reliability needs.</p>
<p>Response: The SDT recognizes the concerns expressed by Oncor relative to the ERCOT system, and notes that if Oncor or ERCOT would like more certainty regarding the applicability of the standard, ERCOT can pursue a Regional Variance on an Interconnection-Wide basis through the NERC-approved TRE process. The SDT agrees that there are other methodologies that can be used in other Interconnections that are effective at meeting the underlying reliability needs, but notes that none of those other methods are mandatory or enforceable by the ERO. By pursuing a variance, entities can define how they meet the reliability goals of the standard through alternative means and specify how they will demonstrate compliance with the alternative process to the ERO. A simple exemption from the standard does not attempt to ensure that reliability is being maintained by the entities wishing to be exempted, as there is nothing that compels an entity to meet the reliability goals from which the exemption is being sought.</p>			
Sierra Pacific Power Co.	1	Affirmative	<p>Affirmative vote; however, I would like to point out a disagreement with R9 of the Standard MOD-001-1. It doesn't appear to me that a Planning Coordinator or Reliability Coordinator would have a plausible need for the data requested in the sub-items of R9, as they are to be used "solely for the requestor's ATC calculations".</p> <p>In R7, I believe that the Requirement should be revised to allow for differences between operational planning and the calculation of ATC values, as this is necessary in a dynamic environment.</p>
<p>Response: The SDT notes that the Planning Coordinator or Reliability Coordinator may choose to undertake ATC or AFC calculations and studies; they simply would not be subject to the requirements within the MOD standards.</p>			
<p>Regarding R7, the SDT does allow for such differences in the requirement; they simply cannot be more limiting in the ATC calculation.</p>			

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<p>However, the SDT also notes that the measure specifies that the use of more current data (e.g., new reservations, outage information, load forecasts, etc...) is not to be considered a violation.</p>			
Tucson Electric Power Co.	1	Affirmative	TEP supports WECC Team remedial language clarifying VSL severity level.
<p>Response: The SDT does not have the WECC team remedial language, and therefore cannot comment on it.</p>			
Independent Electricity System Operator	2	Affirmative	<p>The revised R3.6.3 may lead to confusion. The term “outages from other Transmission Service Providers that can not be mapped to the Transmission model used to calculate transfer or Flowgate capability” is subject to interpretation, which needs clarifying.</p> <p>Specific to R6 and R7 - The wording “no more limiting than” as opposed to using something like “consistent with” may give rise to the use of less limiting assumptions. The qualifying phrase appended to these requirements “providing such planning of operations has been performed for that time period” does not provide any value, nor does it address the issue brought up above.</p>
<p>Response: Regarding R3.6.3, the SDT believes the current language clearly expresses the intent of the requirement.</p> <p>The SDT attempted to consider the intent of the Order in its review of this requirement. It seems clear, from both a reading of the Order and from comments submitted to the SDT, that FERC’s intent is to ensure that service is not sold on a more conservative basis than the system has been planned for. Accordingly, the SDT modified this requirement to more closely align with this goal. Additionally, it was pointed out that requiring the two to be “consistent” could lead to conflicts and double jeopardy between these standards and the planning standards. For example, ATC studies should not use a more constraining load forecasting methodology than that used in planning of operations.</p> <p>Regarding the qualifying phrase, the SDT was clarifying that in some cases, there may not be studies done for certain times, and the standard does not require those studies for planning of operations be performed.</p>			
Midwest ISO, Inc.	2	Abstain	<p>R3.5: Various Joint Operating Agreements (JOA) and other stand alone documents that describe the flowgate allocation processes for Midwest ISO and its neighboring entities are already posted on public websites. Midwest ISO does not believe it is reasonable to include the identical content in the ATCID that is in another stand alone document, whose contents could contain considerable length. Instead, Midwest ISO believes referencing appropriate documents via links included in the ATCID is an acceptable alternative that will prevent updating multiple documents due to a revision in a JOA. Thus, Midwest ISO submits the following revision to R3:</p> <p>R3: Each Transmission Service Provider shall prepare and keep current an Available Transfer Capability Implementation Document (ATCID) that includes, at a minimum, the following information or links to posted documents that contain the following information:</p>

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			<p>R6: Midwest ISO continues to believe that the phrase “no more limiting” is not clear for all specific assumptions used when calculating TTC or TFC. This seems to leave it up to the individual auditor to make a decision to decide which assumption is more limiting. We believe that the essence of a standard is to remove subjectivity from the determination of compliance.</p> <p>R7: Midwest ISO continues to believe that the phrase “no more limiting” is not clear for all specific assumptions used when calculating TTC or TFC. This seems to leave it up to the individual auditor to make a decision to decide which assumption is more limiting. We believe that the essence of a standard is to remove subjectivity from the determination of compliance.</p>
<p>Response: The SDT has not specified a format for the ATCID, and believes that the inclusion of a JOA within the document (either directly or by reference) would meet the intent of the requirement, provided the referenced documents met all other criteria for the ATCID (i.e., notifications of changes, availability). Note that NAESB is specifying business practices related to the posting of information that may relate to this topic.</p> <p>Regarding R6 and R7, the SDT notes that the measure provides guidance regarding what data is to be considered relevant. The measure also clarifies that “assumptions” are different from “data inputs,” as the SDT expects inputs to change as more current data becomes available. The SDT believes that the measure and the requirement together address the Midwest ISO’s concerns.</p>			
New York Independent System Operator	2	Abstain	<p>The NYISO abstains from voting on this proposed standard. The NYISO appreciates recent feedback from the Standards Drafting Team on several rounds of comments requesting that revisions be made to the language of this proposed standard in order to:</p> <ul style="list-style-type: none"> (i) expressly accommodate the NYISO’s FERC-approved market design and financial reservation based open access transmission system; and (ii) eliminate any possible question as to whether the NYISO’s existing approach to calculating ATC satisfies the requirements of the proposed standards. <p>The Standards Drafting Team has indicated that it believes that the NYISO’s existing procedures are compliant with the proposed standard. Nevertheless, the NYISO is abstaining in order to preserve its rights to seek a formal confirmation of its compliance from FERC or NERC.</p>
<p>Response: The SDT cannot provide such formal confirmation, but thanks you for your supportive comment.</p>			
Ameren Services Company	3	Negative	<p>Ameren would like to thank the SDT for the considerable effort invested in drafting this standard. However, Ameren cannot support this version of MOD-001-1.</p> <p>Under R1, the Transmission Service Provider not the Transmission Operator should be responsible for selection of the ATC/AFC methodology. This is especially true when the Transmission Service Provider determines ATC for the transmission systems of several Transmission Operators as would occur in an RTO/ISO such as the MISO. R5 suggests that the Transmission Operator is responsible to calculate TTC or TFC. This is not supported by the current version of the Functional Model. Determining TTC (TFC) is a planning function supported</p>

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			by the Transmission Planner. The majority of requirements are limited to the Operations Planning Time Horizon. TTC (TFC) and ATC (TFC) are also parameters which are relevant in the plus one year.
<p>Response: The Functional Model does not attribute the determination of TTC to any entity. As such, the SDT was required to interpret the model to determine the appropriate entity for determining TTC and selecting the methodology. Since the ratings of facilities are established by the Transmission Operator, the SDT felt it appropriate to assign the responsibility for TTC to the Transmission Operator. Since TTC is determined prior to ATC, the SDT felt the Transmission Operator would be the appropriate entity to select the methodology. While many entities may have delegated this responsibility to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established.</p> <p>The SDT agrees that some entities may choose to address TTC/TFC and ATC/AFC beyond the first year, the SDT has elected to remain consistent with the previous version of the standards and not address more than the first 13 months in this version.</p>			
City Public Service of San Antonio	3	Negative	I cannot vote for this standard as written. It needs to acknowledge definitive alternatives to ATC for regions or markets such as ERCOT where transmission service markets are not used.
<p>Response: The SDT recognizes the concerns expressed by City Public Service of San Antonio relative to the ERCOT system, and notes that if City Public Service or ERCOT would like more certainty regarding the applicability of the standard, ERCOT can pursue a Regional Variance on an Interconnection-Wide basis through the NERC-approved TRE process.</p>			
Constellation Energy	3	Affirmative	Greater standardization in the use of counterflows is required.
<p>Response: The SDT was unable to provide a greater level of standardization of counterflows at this time, and suggests that the commenter request NERC to consider this item in the development of its annual standards development work plan.</p>			
FirstEnergy Solutions	3	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 MOD-001 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and its member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-001 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and

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			<p>Attachment C of the MISO Open Access Transmission and Energy Market Tariff. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. As described in the procedure, "Variances should be identified and considered when a SAR is posted for comment. Variances should also be considered in the drafting of a standard, with the intent to make any necessary variances a part of the initial development of a standard. The public posting allows for all impacted parties to identify the requirements of a NERC reliability standard that might require a variance." FE believes it is important to complete and include the MISO variance in conjunction with the drafting of the MOD-001 standard.</p> <p>FE requests the variance to cover TOP tasks as described in the following requirements: - R1: Selection the ATC or AFC methodology - R6: Calculation of TTC or TFC. Additional Comments: R1 & R6: Selection of ATC or AFC Methodology(ies): We appreciate the effort taken by the SDT during the last comment period in seeking industry feedback regarding which responsible entity, the Transmission Service Provider (TSP) or Transmission Operator (TOP), should be responsible for selecting the ATC or AFC methodology used to calculate ATC or AFC. In the SDT team's response to industry comments it was indicated that 13 out of 35 responders felt the TSP is the appropriate responsible entity and it was the SDT's opinion that this did not show consensus from the industry to change the SDT's proposed assignment of the requirement to the TOP. However, the SDT failed to recognize that only 7 favored the TOP and that 15 respondents were indifferent to the TSP or TOP being assigned. The SDT's action to keep the TOP as the responsible entity assumes the team was correct in its initial assignment. In reality, the review of data from industry should have been 7 for TOP and 13 for TSP. This is nearly a 2 to 1 response in favor of the TSP selecting the methodology. Therefore, FE believes the SDT failed to make the appropriate adjustment and that the TSP is the appropriate responsible entity for this requirement.</p>
<p>Response: The SDT believes the Functional Model indicates that these requirements are the responsibility of the Transmission Operator. While many entities may have delegated these tasks to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. The SDT believes the transfer of responsibility described within the MISO Transmission Owners Agreement would be an effective way to delegate this task to a Transmission Service Provider through the registration of a Joint Registration Organization. To the extent an entity variance is desired, First Energy and/or MISO would need to submit a SAR to request the variance.</p> <p>As described in the SDT's responses to comments, there was not a clear majority in support of the Transmission Service Provider. There was a majority (as noted by First Energy) that did not express a preference. Had an overwhelming majority indicated that the Transmission Service Provider was the correct entity, the SDT would have considered a change to the standard. However, we note that no entity provided a clear explanation of why the Transmission Service Provider was the appropriate entity. The SDT acknowledges that some entities stated that their</p>			

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<p>Transmission Service Provider performed the task, and that it was easier for a regional entity to perform the task, but no entity provided support (through the Functional Model or any other means) for why the responsibility should be shifted to the Transmission Service Provider. The SDT also notes that in previous comments, some entities supported the assignment to the Transmission Operator. Accordingly, without a rationale for the change, and with a majority that did not express a preference, the SDT felt a change was unwarranted.</p>			
MidAmerican Energy Co.	3	Negative	<p>I am concerned with R7 and M7. I do not see how technically models can be created day to day to use in operational planning that incorporate transmission service requests that change instantaneously each and every day.</p> <p>Also, I believe TRM should not be used in operational planning. I recommend that R7 and M7 be revised to specifically allow differences between operational planning and ATC and AFC for transmission service requests and TRM.</p>
<p>Response: Regarding R7, the SDT does allow for such differences in the requirement; they simply cannot be more limiting in the ATC calculation. However, the SDT also notes that the measure specifies that the use of more current data (e.g., new reservations, outage information, load forecasts, etc...) is not to be considered a violation.</p> <p>Studies performed during operational planning will include consistent assumptions used to determine TRM, but may not necessarily include TRM itself. For many entities, TRM would decrease as entities approach real-time, due to the reduction of uncertainty as risks do not materialize. However, in some cases (such as TRM held for reserve sharing), the TRM value might not change, and would need to be incorporated in operational planning.</p>			
Wisconsin Public Service Corp.	3	Negative	<p>R7 and M7 of MOD-001-1 should be revised to specifically allow differences between operational planning and calculating ATC and AFC for transmission service requests and for TRM. Incorporating transmission service requests, which change frequently, into operational planning models is problematic.</p> <p>Also, TRM can be used to calculate ATC and AFC and that TRM should not be used in operational planning. The Transmission Operator should not be the responsible entity for R1 and R6 in MOD-001, it should be the Transmission Service Provider.</p>
<p>Response: Regarding R7, the SDT does allow for such differences in the requirement; they simply cannot be more limiting in the ATC calculation. However, the SDT also notes that the measure specifies that the use of more current data (e.g., new reservations, outage information, load forecasts, etc...) is not to be considered a violation.</p> <p>Studies performed during operational planning will include consistent assumptions used to determine TRM, but may not necessarily include TRM itself. For many entities, TRM would decrease as entities approach real-time, due to the reduction of uncertainty as risks do not materialize. However, in some cases, (such as TRM held for reserve sharing), the TRM value might not change, and would need to be incorporated in operational planning.</p> <p>The SDT believes the correct entity for R1 and R6 is the Transmission Operator, based on the SDT's interpretation of the Functional Model.</p>			
Alliant	4	Negative	<p>We are concerned with R7 and M7. We do not see how it is feasible technically to create models</p>

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Energy Corp. Services, Inc.			<p>day to day for use in operational planning that incorporate transmission service requests that change instantaneously day to day.</p> <p>We also believe TRM can be used to calculate ATC and AFC and that TRM should not be used in operational planning.</p> <p>We believe the responsible entity in R1 and R6 should be the Transmission Service Provider.</p>
<p>Response: Regarding R7, the SDT does allow for such differences in the requirement; they simply cannot be more limiting in the ATC calculation. However, the SDT also notes that the measure specifies that the use of more current data (e.g., new reservations, outage information, load forecasts, etc...) is not to be considered a violation.</p> <p>Studies performed during operational planning will include consistent assumptions used to determine TRM, but may not necessarily include TRM itself. For many entities, TRM would decrease as entities approach real-time, due to the reduction of uncertainty as risks do not materialize. However, in some cases, (such as TRM held for reserve sharing), the TRM value might not change, and would need to be incorporated in operational planning.</p> <p>The SDT believes the correct entity for R1 and R6 is the Transmission Operator, based on the SDT's interpretation of the Functional Model.</p>			
Public Utility District No. 1 of Douglas County	4	Negative	We have not had sufficient time to review the effects of this change and coordinate it with others in our region.
<p>Response: The SDT believes that significant time has been allowed for entities to review and comment on the standard.</p>			
WPS Resources Corp.	4	Negative	<p>Requirement R5. The ATCID should be made available to all users, owners, and operators. That is, the document should be publicly available.</p> <p>R1 and R6 should be the responsibility of the Transmission Service Provider.</p>
<p>Response: The North American Energy Standards Board (NAESB) is responsible for developing standards related to public availability of information to support commercial needs. The SDT believes it is NAESB's intention to require the disclosure of the ATCID on the OASIS.</p> <p>The SDT believes the correct entity for R1 and R6 is the Transmission Operator, based on the SDT's interpretation of the Functional Model.</p>			
Constellation Generation Group	5	Negative	Greater standardization in the use of counterflows is required than provided in this standard.
<p>Response: The SDT was unable to provide a greater level of standardization of counterflows at this time, and suggests that the commenter request NERC to consider this item in the development of its annual plan.</p>			
Electric Power Supply Association	5	Negative	There should be greater standardization regarding the use of counterflows.

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<p>Response: The SDT was unable to provide a greater level of standardization of counterflows at this time, and suggests that the commenter request NERC to consider this item in the development of its annual plan.</p>			
Entegra Power Group, LLC	5	Negative	<p>Gentlemen, we should be pursuing a transmission service model which would grant or deny ATC that is "AS ACCURATE AS POSSIBLE". Therefore, the following should be implemented: Daily, weekly, and monthly ATC models should contain the "actual generation that is expected to run for that period" included in the model. Discrete elements, up to 3 buses, for neighboring regions. Interregional Coordination. The model should not be allowed to contain 1st contingency Base Case Overloads.</p>
<p>Response: The SDT believes that actual generation that is expected to run for the period is included in the MOD-028 and MOD-030 methodologies. As MOD-029 does not use simulation in its determination of ATC, such information is not used.</p> <p>The SDT has specified modeling requirements that in the majority of cases encompass those suggested.</p> <p>The SDT has specified some inter-regional coordination in the standards, by requiring the use of neighbors' data and requiring that data be made available to neighbors.</p> <p>The models are required to reflect the current expectation of reality. Other standards, including the FAC standards, address allowable facility loading for operations and planning.</p>			
FirstEnergy Solutions	5	Negative	<p>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 MOD-001 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and its member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-001 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and Attachment C of the MISO Open Access Transmission and Energy Market Tariff. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development of the standard is appropriate per the NERC standard development procedure. As described in</p>

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			<p>the procedure, "Variances should be identified and considered when a SAR is posted for comment. Variances should also be considered in the drafting of a standard, with the intent to make any necessary variances a part of the initial development of a standard. The public posting allows for all impacted parties to identify the requirements of a NERC reliability standard that might require a variance." FE believes it is important to complete and include the MISO variance in conjunction with the drafting of the MOD-001 standard. FE requests the variance to cover TOP tasks as described in the following requirements: - R1: Selection the ATC or AFC methodology - R6: Calculation of TTC or TFC. Additional Comments: R1 " Selection of ATC or AFC Methodology(ies): We appreciate the effort taken by the SDT during the last comment period in seeking industry feedback regarding which responsible entity, the Transmission Service Provider (TSP) or Transmission Operator (TOP), should be responsible for selecting the ATC or AFC methodology used to calculate ATC or AFC. In the SDT team's response to industry comments it was indicated that 13 out of 35 responders felt the TSP is the appropriate responsible entity and it was the SDT's opinion that this did not show consensus from the industry to change the SDT's proposed assignment of the requirement to the TOP. However, the SDT failed to recognize that only 7 favored the TOP and that 15 respondents were indifferent to the TSP or TOP being assigned. The SDT's action to keep the TOP as the responsible entity assumes the team was correct in its initial assignment. In reality, the review of data from industry should have been 7 for TOP and 13 for TSP. This is nearly a 2 to 1 response in favor of the TSP selecting the methodology. Therefore, FE believes the SDT failed to make the appropriate adjustment and that the TSP is the appropriate responsible entity for this requirement.</p>
<p>Response: The SDT believes the Functional Model indicates that these requirements are the responsibility of the Transmission Operator. While many entities may have delegated these tasks to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. The SDT believes the transfer of responsibility described within the MISO Transmission Owners Agreement would be an effective way to delegate this task to a Transmission Service Provider through the registration of a Joint Registration Organization. To the extent an entity variance is desired, First Energy and/or MISO would need to submit a SAR to request the variance.</p> <p>As described in the SDT's responses to comments, there was not a clear majority in support of the Transmission Service Provider. There was a majority (as noted by First Energy) that did not express a preference. Had an overwhelming majority indicated that the Transmission Service Provider was the correct entity, the SDT would have considered a change to the standard. However, we note that no entity provided a clear explanation of why the Transmission Service Provider was the appropriate entity. The SDT acknowledges that some entities stated that their Transmission Service Provider performed the task, and that it was easier for a regional entity to perform the task, but no entity provided support (through the Functional Model or any other means) for why the responsibility should be shifted to the Transmission Service Provider. The SDT also notes that in previous comments, some entities supported the assignment to the Transmission Operator. Accordingly, without a rationale for the change, and with a majority that did not express a preference, the SDT felt a change was unwarranted.</p>			

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Reliant Energy Services	5	Negative	Reliant Energy, Inc. is concerned the proposed MOD-001-1 would include the ERCOT Region (TOP, TSP) in the NERC requirements to calculate ATC. ERCOT uses the CSC methodology that differs from the ATC methodology used in the eastern interconnection. This change would serve no reliability purpose in ERCOT, which operates as a single control area. As such, the standard should contain exclusionary language added for ERCOT so as not to apply to the ERCOT Region.
<p>Response: The SDT recognizes the concerns expressed by Reliant Energy relative to the ERCOT system, and notes that if Reliant or ERCOT would like more certainty regarding the applicability of the standard, ERCOT can pursue a Regional Variance on an Interconnection-Wide basis through the NERC-approved TRE process.</p>			
Barry Green Consulting Inc.	6	Negative	Greater standardization in the use of counterflows is required
<p>Response: The SDT was unable to provide a greater level of standardization of counterflows at this time, and suggests that the commenter request NERC to consider this item in the development of its annual plan.</p>			
Constellation Energy Commodities Group	6	Negative	Greater standardization in the use of counterflows is required.
<p>Response: The SDT was unable to provide a greater level of standardization of counterflows at this time, and suggests that the commenter request NERC to consider this item in the development of its annual plan.</p>			
FirstEnergy Solutions	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 MOD-001 standard within the Midwest ISO (MISO) footprint, FE is voting NEGATIVE to the standard as written. In prior comment periods, FE has indicated its concerns with requirements assigned to NERC registered entity classifications that apply to FE, but in actuality are performed by the MISO. The SDT has not changed its position and has indicated that FE could delegate responsibility to MISO. However, as previously stated, FE believes a standard should not be written in a way that would knowingly require delegation agreements for a large number of responsible entities. Therefore, in order for FE to support this standard, we request that the SDT work with MISO and its member companies to complete a regional variance for the MISO regional transmission organization and include it within the standard as a Regional Difference. A variance is needed to explain the MOD-001 requirements that describe tasks which have been transferred by the MISO member transmission companies to the MISO organization. This transfer of responsibility is described in the MISO Transmission Owners Agreement and Attachment C of the MISO Open Access Transmission and Energy Market Tariff. It is FE's opinion that an Entity Variance as described in the NERC Reliability Standards Development Procedure is the appropriate mitigation measure and that including the variance with the initial development

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			<p>of the standard is appropriate per the NERC standard development procedure. As described in the procedure, "Variances should be identified and considered when a SAR is posted for comment. Variances should also be considered in the drafting of a standard, with the intent to make any necessary variances a part of the initial development of a standard. The public posting allows for all impacted parties to identify the requirements of a NERC reliability standard that might require a variance." FE believes it is important to complete and include the MISO variance in conjunction with the drafting of the MOD-001 standard. FE requests the variance to cover TOP tasks as described in the following requirements: - R1: Selection the ATC or AFC methodology - R6: Calculation of TTC or TFC. Additional Comments: R1 " Selection of ATC or AFC Methodology(ies): We appreciate the effort taken by the SDT during the last comment period in seeking industry feedback regarding which responsible entity, the Transmission Service Provider (TSP) or Transmission Operator (TOP), should be responsible for selecting the ATC or AFC methodology used to calculate ATC or AFC. In the SDT team's response to industry comments it was indicated that 13 out of 35 responders felt the TSP is the appropriate responsible entity and it was the SDT's opinion that this did not show consensus from the industry to change the SDT's proposed assignment of the requirement to the TOP. However, the SDT failed to recognize that only 7 favored the TOP and that 15 respondents were indifferent to the TSP or TOP being assigned. The SDT's action to keep the TOP as the responsible entity assumes the team was correct in its initial assignment. In reality, the review of data from industry should have been 7 for TOP and 13 for TSP. This is nearly a 2 to 1 response in favor of the TSP selecting the methodology. Therefore, FE believes the SDT failed to make the appropriate adjustment and that the TSP is the appropriate responsible entity for this requirement.</p>
<p>Response: The SDT believes the Functional Model indicates that these requirements are the responsibility of the Transmission Operator. While many entities may have delegated these tasks to Transmission Service Providers through implementation of regional transmission service, the SDT does not believe this alone changes the responsibilities established. The SDT believes the transfer of responsibility described within the MISO Transmission Owners Agreement would be an effective way to delegate this task to a Transmission Service Provider through the registration of a Joint Registration Organization. To the extent an entity variance is desired, First Energy and/or MISO would need to submit a SAR to request the variance.</p> <p>As described in the SDT's responses to comments, there was not a clear majority in support of the Transmission Service Provider. There was a majority (as noted by First Energy) that did not express a preference. Had an overwhelming majority indicated that the Transmission Service Provider was the correct entity, the SDT would have considered a change to the standard. However, we note that no entity provided a clear explanation of why the Transmission Service Provider was the appropriate entity. The SDT acknowledges that some entities stated that their Transmission Service Provider performed the task, and that it was easier for a regional entity to perform the task, but no entity provided support (through the Functional Model or any other means) for why the responsibility should be shifted to the Transmission Service Provider. The SDT also notes that in previous comments, some entities supported the assignment to the Transmission Operator. Accordingly, without a rationale for the change, and with a majority that did not express a preference, the SDT felt a change was unwarranted.</p>			

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<p>Response: The SDT recognizes the concerns expressed by Reliant Energy relative to the ERCOT system, and notes that if Reliant or ERCOT would like more certainty regarding the applicability of the standard, ERCOT can pursue a Regional Variance on an Interconnection-Wide basis through the NERC-approved TRE process.</p>			
Electric Reliability Council of Texas, Inc.	10	Negative	The standard as proposed contains no clear applicability only to those Transmission Operators or Transmission Service providers who utilize ATC in their transmission system and market operations.
<p>Response: The SDT has attempted to make this clear in the definition of ATC Path. However, the SDT recognizes ERCOT's concerns, and notes that if ERCOT would like more certainty regarding the applicability of the standard, ERCOT can pursue a Regional Variance on an Interconnection-Wide basis through the NERC-approved TRE process.</p>			
Midwest Reliability Organization	10	Negative	The MRO is concerned with R7 and M7. We do not see how technically models can be created day to day for use in operational planning that incorporate transmission service requests that change instantaneously each and every day. Also, we believe TRM can be used to calculate ATC and AFC and that TRM should not be used in operational planning. We believe that R7 and M7 of MOD-001-1 should be revised to specifically allow differences between operational planning and ATC and AFC for transmission service requests and for TRM.
<p>Response: Regarding R7, the SDT does allow for such differences in the requirement; they simply cannot be more limiting in the ATC calculation. However, the SDT also notes that the measure specifies that the use of more current data (e.g., new reservations, outage information, load forecasts, etc...) is not to be considered a violation.</p> <p>Studies performed during operational planning will include consistent assumptions used to determine TRM, but may not necessarily include TRM itself. For many entities, TRM would decrease as entities approach real-time, due to the reduction of uncertainty as risks do not materialize. However, in some cases (such as TRM held for reserve sharing), the TRM value might not change, and would need to be incorporated in operational planning.</p> <p>The SDT believes the correct entity for R1 and R6 is the Transmission Operator, based on the SDT's interpretation of the Functional Model.</p>			