

Consideration of Comments on Initial Ballot — MOD-028-1 — Area Interchange Methodology

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
Brazos Electric Power Cooperative, Inc.	1	Negative	A NEGATIVE vote is cast 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 the requirements to recognize that such market difference exists.
Response: If ERCOT does not choose to implement this methodology, then this standard would not apply to ERCOT. If ERCOT does not have ATC Paths, or ERCOT has an associated variance, MOD-001 would not require them to select a methodology.			
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.</p> <p>Suggested modifications to the standards to achieve this consistency are included in our comments. MOD-028-1 Area Interchange Methodology, MOD-029-1 Rated System Path Methodology and MOD-030-1 Flowgate Methodology In the "Purpose" section, all three standards state, "To increase consistency and reliability in the development and documentation of Transfer Capability calculations for "short-term use". Short-term is an undefined term and it applies that these standards do not apply to ATC calculations beyond the "short-term" period. In is recommended that the phrase for "short-term use" be removed from the purpose.</p>
Response: The SDT does not believe the term used in the Purpose statement of the standard is confusing. The requirements themselves specify all time periods for which entities will be expected to comply.			
Great River Energy	1	Negative	GRE is concerned with the Transmission Operator being the responsible entity for MOD-

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			028_R2-R7. GRE believes that the responsible entity for these requirements should be the Transmission Service Provider. It is GRE's opinion that a standard should not knowingly be written in a manner that requires delegation agreements to be created for a large number of responsible entities, doing so is an inefficient use of resources.
<p>Response: The SDT believes the Functional Model indicates these requirements should apply to 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. Note that given the lack of consistency in how the industry performs these functions, a change to the Transmission Operator could require other entities to enter into similar delegation agreements to address that situation. If an entity does not want delegation agreements, then an entity variance or the use of a Joint Registration Organization may be appropriate.</p>			
Sierra Pacific Power Co.	1	Affirmative	Affirmative vote with comment: The severity levels surrounding R1 still appear to imply that all of the sub-items of R1.1 are expected to be used in the TRMID. It must be clear that it does not constitute a violation if various of these sub-items are not applicable to the TRMID used by the entity. Clarify that this is "as applicable" or "as determined by the entity".
<p>Response: This comment has been addressed with the MOD-008 standard.</p>			
Southwest Transmission Cooperative, Inc.	1	Abstain	No WECC entity that has definitely elected to use MOD-28; therefore, we recommend no action.
<p>Response: The SDT concurs.</p>			
New York Independent System Operator	2	Abstain	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: (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. 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>Response: The SDT cannot provide such formal confirmation, but thanks you for your supportive comment.</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: If ERCOT does not choose to implement this methodology, then this standard would not apply to ERCOT. If ERCOT does not have ATC Paths, or ERCOT has an associated variance, MOD-001 would not require them to select a methodology.</p>			
Duke Energy Carolina	3	Affirmative	While we support approval of this standard, bulk electric system facilities 161kV and below may have significant network response. Since these facilities may have significant impact on TTC/AFC, documentation should be required by the standard for those

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			facilities 161kV and below which are equivalized. This will provide transparency for impacted stakeholders.
<p>Response: The standard does not require, but also does not forbid, such documentation. If a region believes that facilities 161 kV and below should not be equivalenced or more transparency is required, then that region can write a regional standard that is more stringent.</p>			
Lincoln Electric System	3	Negative	LES is concerned with the Transmission Operator being the responsible entity for R2 through R7 for MOD-028. We believe that the responsible entity for these requirements should be the Transmission Service Provider
<p>Response: The SDT does not find a clear rationale for selecting the Transmission Service Provider as the entity responsible for calculating TTC. The Functional Model requires the Transmission Operator to determine SOLs (Defines System Operating Limits based on facility information provided by the Transmission Owners and Generator Owners and assistance from Reliability Coordinator), which we believe ties them to determining TTC. The Transmission Service Provider is responsible for providing service within the constraints established by the Transmission Operator, not actually establishing those constraints.</p> <p>If an entity believes the TSP to be the appropriate entity, then options for delegation of this task exist. The Transmission Service Provider and their Transmission Operators can register as a Joint Registration Organization, with the Transmission Service Provider agreeing to take on responsibility for this requirement through written contract. If an entity does not want delegation agreements, then an entity variance or the use of a Joint Registration Organization may be appropriate.</p>			
Wisconsin Public Service Corp.	3	Negative	The Transmission Service Provider should be the responsible entity for R2 through R7 for MOD-028, not the Transmission Operator.
<p>Response: The SDT does not find a clear rationale for selecting the Transmission Service Provider as the entity responsible for calculating TTC. The Functional Model requires the Transmission Operator to determine SOLs (Defines System Operating Limits based on facility information provided by the Transmission Owners and Generator Owners and assistance from Reliability Coordinator), which we believe ties them to determining TTC. The Transmission Service Provider is responsible for providing service within the constraints established by the Transmission Operator, not actually establishing those constraints.</p> <p>If an entity believes the TSP to be the appropriate entity, then options for delegation of this task exist. The Transmission Service Provider and their Transmission Operators can register as a Joint Registration Organization, with the Transmission Service Provider agreeing to take on responsibility for this requirement through written contract. If an entity does not want delegation agreements, then an entity variance or the use of a Joint Registration Organization may be appropriate.</p>			
Alliant Energy Corp. Services, Inc.	4	Negative	We believe the responsible entity for R2 thru R7 should be the Transmission Service Provider, not the Transmission Operator.
<p>Response: The SDT does not find a clear rationale for selecting the Transmission Service Provider as the entity responsible for calculating TTC. The Functional Model requires the Transmission Operator to determine SOLs (Defines System Operating Limits based on facility information provided by the Transmission Owners and Generator Owners and assistance from Reliability Coordinator), which we believe ties them to determining TTC. The Transmission Service Provider is responsible for providing service within the constraints established by the Transmission Operator, not actually establishing those constraints.</p> <p>If an entity believes the TSP to be the appropriate entity, then options for delegation of this task exist. The Transmission Service Provider and their Transmission Operators can register as a Joint Registration Organization, with the Transmission Service Provider agreeing to take on</p>			

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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.
Response: The SDT believes that significant time has been allowed for entities to review and comment on the standard.			
WPS Resources Corp.	4	Negative	Requirements R2 through R7 list the responsible entity as the Transmission Owner. The Transmission Service Provider should be the responsible entity.
<p>Response: The SDT does not find a clear rationale for selecting the Transmission Service Provider as the entity responsible for calculating TTC. The Functional Model requires the Transmission Operator to determine SOLs (Defines System Operating Limits based on facility information provided by the Transmission Owners and Generator Owners and assistance from Reliability Coordinator), which we believe ties them to determining TTC. The Transmission Service Provider is responsible for providing service within the constraints established by the Transmission Operator, not actually establishing those constraints.</p> <p>If an entity believes the TSP to be the appropriate entity, then options for delegation of this task exist. The Transmission Service Provider and their Transmission Operators can register as a Joint Registration Organization, with the Transmission Service Provider agreeing to take on responsibility for this requirement through written contract. If an entity does not want delegation agreements, then an entity variance or the use of a Joint Registration Organization may be appropriate.</p>			
Lincoln Electric System	5	Negative	LES is concerned with the Transmission Operator being the responsible entity for R2 through R7 for MOD-028. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
<p>Response: The SDT does not find a clear rationale for selecting the Transmission Service Provider as the entity responsible for calculating TTC. The Functional Model requires the Transmission Operator to determine SOLs (Defines System Operating Limits based on facility information provided by the Transmission Owners and Generator Owners and assistance from Reliability Coordinator), which we believe ties them to determining TTC. The Transmission Service Provider is responsible for providing service within the constraints established by the Transmission Operator, not actually establishing those constraints.</p> <p>If an entity believes the TSP to be the appropriate entity, then options for delegation of this task exist. The Transmission Service Provider and their Transmission Operators can register as a Joint Registration Organization, with the Transmission Service Provider agreeing to take on responsibility for this requirement through written contract. If an entity does not want delegation agreements, then an entity variance or the use of a Joint Registration Organization may be appropriate.</p>			
Lincoln Electric System	6	Negative	LES is concerned with the Transmission Operator being the responsible entity for R2 through R7 for MOD-028. We believe that the responsible entity for these requirements should be the Transmission Service Provider.
<p>Response: The SDT does not find a clear rationale for selecting the Transmission Service Provider as the entity responsible for calculating TTC. The Functional Model requires the Transmission Operator to determine SOLs (Defines System Operating Limits based on facility information provided by the Transmission Owners and Generator Owners and assistance from Reliability Coordinator), which we believe ties them to determining TTC. The Transmission Service Provider is responsible for providing service within the constraints established by the Transmission Operator, not actually establishing those constraints.</p>			

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<p>Electric Reliability Council of Texas, Inc.</p>	<p>10</p>	<p>Abstain</p>	<p>Although stated in the Applicability Section of the Standard, the Requirements and Measures contain no clear applicability only to those Transmission Operators and Transmission Service Providers who utilize AIM in calculating ATC and TTC for their transmission system and market operations.</p>
<p>Response: The Applicability Section of the standard applies to the entire standard.</p>			
<p>Midwest Reliability Organization</p>	<p>10</p>	<p>Negative</p>	<p>The MRO is concerned with the Transmission Operator being the responsible entity for R2 through R7 for MOD-028. We believe that the responsible entity for these requirements should be the Transmission Service Provider.</p>
<p>Response: The SDT does not find a clear rationale for selecting the Transmission Service Provider as the entity responsible for calculating TTC. The Functional Model requires the Transmission Operator to determine SOLs (Defines System Operating Limits based on facility information provided by the Transmission Owners and Generator Owners and assistance from Reliability Coordinator), which we believe ties them to determining TTC. The Transmission Service Provider is responsible for providing service within the constraints established by the Transmission Operator, not actually establishing those constraints.</p> <p>If an entity believes the TSP to be the appropriate entity, then options for delegation of this task exist. The Transmission Service Provider and their Transmission Operators can register as a Joint Registration Organization, with the Transmission Service Provider agreeing to take on responsibility for this requirement through written contract. If an entity does not want delegation agreements, then an entity variance or the use of a Joint Registration Organization may be appropriate.</p>			