

## Consideration of Comments on Initial Ballot — MOD-029-1 — Rated System Path 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.
<b>Response:</b> 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	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. MOD-028-1 Area Interchange Methodology, MOD-029-1 Rated System Path Methodology - Both standards need the following requirement added: Use first contingency criteria consistent with those first contingency used in operations studies and planning studies for the applicable time periods, including use of Special Protection Systems.
<b>Response:</b> The SDT believes the intent of this suggestion is addressed in MOD-001 R6 and R7.			
Southwest Transmission Cooperative, Inc.	1	Affirmative	SWTC supports all elements of MOD-29; however, there is a minority opinion that the VSLs as redrafted to accommodate the industry comments have blurred the lines of severity and grant additional discretion to the enforcement entity.
<b>Response:</b> The SDT reviewed the VSLs and concludes that they appropriately minimize the discretion of the enforcement entity. If in future comments on standards you could be more specific, that would aid the team in addressing your concerns.			
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

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			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.
<b>Response:</b> The SDT cannot provide such formal confirmation, but thanks you for your supportive comment.			
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.
<b>Response:</b> 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.			
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 facilities 161kV and below which are equivalized. This will provide transparency for impacted stakeholders.
<b>Response:</b> 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.			
Wisconsin Public Service Corp.	3	Abstain	This is the rated system path methodology that is used in WECC.
<b>Response:</b> The SDT concurs.			
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.
<b>Response:</b> The SDT believes that significant time has been allowed for entities to review and comment on the standard.			
Electric Reliability Council of Texas, Inc.	10	Abstain	Although stated in the Applicability Section, the Requirements and Measures contain no clear applicability only to those Transmission Operators and Transmission Service providers who utilize the Rated System Path methodology in calculating TTC and ATC.
<b>Response:</b> The entire standard applies only to those entities who utilize the Rated System Path methodology in calculating TTC and ATC.			
Midwest Reliability Organization	10	Abstain	This is the rated system path methodology that is used in WECC.
<b>Response:</b> The SDT concurs.			