

**NERC**

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

# Consideration of Comments Summary

Project 2010-04 Demand Data

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**RELIABILITY | ACCOUNTABILITY**



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## Introduction

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The Project 2010-04 standard drafting team (SDT) thanks all commenters who submitted comments on MOD-031-1. The standard was posted for a 45-day formal comment period from July 24, 2013 through September 4, 2013. Stakeholders were asked to provide feedback on the standard and associated documents through a special electronic comment form. There were 45 sets of responses, including comments from approximately 110 different people from approximately 100 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

All comments submitted may be reviewed in their original format on the [project page](#).

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact Vice President and Director of Standards Mark Lauby at 404-446-2560 or at [mark.lauby@nerc.net](mailto:mark.lauby@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

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<sup>1</sup> The appeals process is in the Standard Processes Manual: [http://www.nerc.com/files/Appendix\\_3A\\_StandardsProcessesManual\\_20120131.pdf](http://www.nerc.com/files/Appendix_3A_StandardsProcessesManual_20120131.pdf)

# Consideration of Comments

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## Purpose

The MOD-031-1 SDT appreciates industry's comments on the MOD-031-1 standard. The SDT reviewed all comments carefully and made changes to the standard accordingly; however, the new Standards Process Manual (SPM) does not require the SDT to respond to each comment if an additional comment period and ballot are needed. The following pages are a summary of the comments received and how the SDT addressed them. If a specific comment was not addressed in the summary of comments, please contact the NERC standards developer to discuss.

## Process

Several commenters expressed concern that the simultaneous posting of the Standards Authorization Request (SAR) and the proposed standard for initial comment and ballot was outside the scope of the Standards Process Manual (SPM). The SDT notes that although this action was authorized by the NERC Standards Committee, NERC received an appeal of the SPM, which has been resolved. The SDT notes the process issue is outside the purview of the SDT.

## ROP Section 800/1600 Data Request

Several commenters stated that the existing MOD C standards (MOD-016-1.1, MOD-017-0.1, MOD-018-0, MOD-019-0.1, MOD-020-0 and MOD-021-1) should be retired. Commenters argued that the data could be collected by NERC and the Regional Entities through data requests issued pursuant to Section 800 or Section 1600 of NERC's Rules of Procedure. The SDT concluded that a standard was necessary for two reasons.

First, the standard provides an efficient and enforceable mechanism for NERC and the Regional Entities to obtain demand data from all relevant registered entities across the entire continent. This data is necessary for the ERO to conduct its reliability assessments, such as the Long Term Reliability Assessment.

Second, the standard provides a mechanism for (1) Planning Coordinators and Balancing Authorities to obtain demand data from data owners for their own reliability purposes that is not necessarily connected to the ERO's reliability assessments; and (2) the sharing of such data between Load Serving Entities, Distribution Providers, Balancing Authorities, Resource Planners and Transmission Planners to obtain the data from a neighboring entity. Replacing the MOD C standards with a data request would not provide a mechanism for this data sharing or allow Planning Coordinators and Balancing Authorities to obtain demand data from data owners for their own reliability purposes. The SDT concluded that because there is a reliability need for Planning Coordinators and Balancing Authorities to obtain demand data for their own reliability purposes and for data sharing between registered entities, a standard was appropriate.

## NERC Glossary Term "Demand Side Management"

A couple of commenters asked the SDT not to change the NERC Glossary term "Demand Side Management." The intent in modifying the definition, however, was to respond to a FERC directive. The SDT has revised the definition to provide additional clarity.

## Definition of Terms Used in Standard

Some commenters felt that it was not clear as to what Demand was being requested. In response to their concerns, the SDT developed a definition for Total Internal Demand. Upon acceptance of this standard, this definition will be moved to the NERC Glossary of Terms.

## **Purpose Statement**

A commenter stated that the purpose statement and the title of the proposed standard only referenced Demand data but the requirements also requested energy data. The SDT modified the title as well as the purpose statement to address their concern. The SDT also modified the Purpose Statement to remove ambiguity and provide clarity that the intent of the standard is to define the responsibilities of both the requestor of the data and the respondent to the request as well as the data that could be requested.

## **Applicability Section**

A few commenters questioned why the Balancing Authority would be subject to this standard. The SDT explained that they added the Balancing Authority due to the process used in the WECC. In most regions the Planning Coordinator is the collector of the data but in the WECC the Balancing Authority collects the data. Since this is meant to be a continent wide standard, the SDT needed to address the WECC process, and therefore included the Balancing Authority in the standard, as appropriate.

## **Administrative**

A few commenters stated that they were not sure as to who was their Planning Coordinator. This is an issue that has been identified in other MOD projects and is currently being reviewed.

## **Requirement R1**

One commenter expressed concern that the data being requested in the proposed standard could be burdensome and costly to collect. However, the SDT understood that this is not a new task or cost for entities. The majority of the data being requested is already required within the MOD-016 through MOD-019 and MOD-021 standards. Also, the data identified in Requirement R1 is included in either, or both, of the LTRA and Energy Information Administration's Form EIA 411.

Another commenter did not believe that the FERC directive to provide for standardization of data collected was being addressed. The Requirement R1 standardizes the data that any entity, regardless of location, would be required to provide. The data listed in Requirement R1 Parts 1.3 through 1.5 is the minimum amount of data that would be required to support reliability studies or assessments.

The SDT modified the body of Requirement R1 to clearly state who the requestor could be and what data could be requested.

One commenter stated that they felt that Requirement R1 was open ended such that the data being requested may not be able to be collected within the time allowed. The SDT modified the requirement to limit the data that could be collected to only that which was outlined in the sub-parts. The SDT also modified the language to allow for "any or all" of the data to be requested. This was to allow for instances when a requestor may not have a reliability need to collect all of the data outlined within the standard.

The SDT modified the language in the sub-parts to provide additional clarity as to the type of data being requested.

A couple of commenters disagreed with the need to supply weather normalized actual data. The SDT is providing an equally effective and efficient method for responding to a FERC directive, which required the collection of temperature and humidity. The SDT believes that requiring hourly temperature and humidity values would provide no value since there are differing methods used to weather normalize Demand. The method an entity would use to weather normalize their actual data should be dependent on their unique system configuration.

The SDT removed the sub-requirement for an entity to identify entities within their footprint that were not part of their region. The SDT believes that this requirement did not provide any reliability benefit.

## **Requirement R2**

The SDT modified Requirement R2 to clearly identify to whom the data owners should respond to for data requests developed under Requirement R1. The SDT removed the language from Requirement R2 allowing other neighboring entities to request data as it was felt that there was ambiguity in the language concerning who was requesting data and what data could be requested. The SDT added Requirement R4 to clearly identify the neighboring entities that could request data.

## **Requirement R3**

The SDT modified the language in Requirement R3 to clearly state that the Planning Coordinator or Balancing Authority had an obligation to provide data collected to the Regional Entity when the Regional Entity requested the data. The SDT also added a minimum time frame for responding to a data request from the Regional Entity. This was to ensure that the Planning Coordinator or Balancing Authority would have sufficient time to gather the data and provide it to the Regional Entity.

## **Requirement R4**

The SDT removed the language from Requirement R2 that dealt with allowing neighboring entities the right to request data and created Requirement R4 to allow for this situation. The SDT believes that by creating Requirement R4 it would remove the ambiguity that was created when it was combined with Requirement R2. Requirement R4 clearly states who can request data from a neighboring entity, the data that could be requested and the conditions for which a data owner could refuse to provide the data.

## **Violation Severity Levels (VSLs)**

There were comments regarding concerns with the VSLs. All VSLs have been reviewed and modified as necessary to ensure proper alignment with the requirements.

## **RSAW**

The SDT received comments requesting a Reliability Standards Audit Worksheet (RSAW). A pre- or draft RSAW is being provided in the form of a document titled "Compliance Input". This document provides compliance assessment answers to questions and will be the basis for the contents of the RSAW.

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