

## Consolidated Development Notes

### Project 2011-INT-001 Interpretation of MOD-028 R3.1 for FPL

Based on the nature of this project and the participants' previous working relationships, the Interpretation team chose to do its work through e-mail correspondence, rather than through conference calls or in-person meetings. Below is a summary of the team's work history and deliberations.

NERC Received an Interpretation request from FPL on May 13, 2011.

Following a review of the request, NERC assembled a team to respond made up of the following members:

- Laura Lee (Duke Energy) – Former Chair, ATC-TTC-CBM-TRM Drafting Team (ATCTDT)
- DuShaune Carter (Southern Company) – Former member ATCTDT
- Dennis Kimm (MidAmerican Energy) – Former member ATCTDT
- Cheryl Mendrala (ISO New England) – Former member ATCTDT
- Nate Schweighart (TVA) – Former member ATCTDT

The team began discussing ways to draft the interpretation on June 17, 2011. The team reviewed the previous motivations for drafting the requirements as they were written, and recognized them as an intent to provide more specificity as requested by regulatory authorities. However, the use of the terms may have given the appearance of a more significant obligation to calculate than was intended.

On June 28, 2011 the team began focusing on a draft interpretation to clarify the standard that generally read as follows:

*R2.1 lists the types of TTC calculations that can be made in order to emphasize that the data in the sub-requirements (R3.11, R3.12, and R3.1.3) should coincide with the type of TTC calculation being made: on-peak, off-peak and next-day. Requirement R5 states the frequency the TTC calculations are to occur. It is left up to the entities as to whether for certain time periods if multiple TTC calculations are preferred. For example, some entities may calculate an on-peak and off-peak TTC for their daily and hourly values. Others may just calculate an on-peak TTC. MOD-028 R3 is not intended to require the calculation of specific "on-peak" and "off-peak" values.*

At its July 2011 meeting in Portland, OR, the Standards Committee (SC) developed a draft approach for a “Rapid Revision” to a standard. It was intended that this process could be used to modify a standard when such a modification would more effectively address a request for interpretation. The SC requested that the team working on Project 2011-INT-01 use this approach to respond to the FPL Request for Interpretation.

In August 2011, the team began exploring ways to modify the standard. Because of the “newness” of the approach, there was significant discussion on how to modify the standard such that it did not change the level of performance required, but simply clarify the intent. Several drafts were circulated, ultimately leading to a draft that consolidated the sub-requirements and made them clearer, explicitly focusing on what was needed in specific situations. At the end of August 2011, the team agreed to submit the proposed changes for posting.