

Consideration of Comments on Initial Ballot — Project 2010-10 – FAC Order 729
Successive Ballot Period: 12/30/2010 - 1/8/2011

Summary Consideration:

Some balloters proposed modifications to provide greater clarity, and the following were adopted. Note that none of the modifications changed the scope, intent, or applicability of any of the requirements:

- Moved the definition of “Year One” from Project 2006-02 to this project for complete clarity on the time period associated with the requirements
- Modified the purpose statement to better align with the requirements
- Changed “Methodology” to “methodology throughout the standard
- Added “long-term” to clarify the scope of outages that must be addressed in the methodology
- Clarified that R2, Part 2.2 is limited to distribution of the methodology; added language to R5 to clarify that the assessment results must be shared with entities that have a reliability-related need for the information, but confidential information is protected.
- Added a statement to R6 to clarify that entities are not required to share confidential data
- Rephrased the VSLs for R1 to improve clarity
- Corrected the VSLs for R2 (these had set the lower VSL at a level that described acceptable performance)

If you feel that the drafting team overlooked your comments, 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 the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at herb.schrayshuen@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Balloter	Entity	Segment	Vote	Comment
Mark B Thompson	Alberta Electric System Operator	2	Negative	R6 is an unnecessary administrative requirement that provides no reliability benefit. It attempts to implement the open access concepts of transparency and comparability by allowing a third party to repeat or mimic the Planning Coordinator’s calculations. It is strictly a commercial issue and simply does not belong in enforceable reliability standards. Further, it presumes that the Planning Coordinator is not able to perform its function and that compliance monitoring and enforcement processes of NERC and the Regional Entities will not detect deficiencies which will result in mitigation plans to correct deficiencies. Furthermore, some entities simply cannot have the data without violating FERC standards of conduct and data confidentiality policies.
Response: R6 serves a reliability purpose; it provides sufficient data for those entities with a reliability related requirement to verify data, to verify assumptions and to validate assessments.				
Jennifer Richardson	Ameren Energy Marketing Co.	6	Negative	(1) R1.4.3 should be modified to be System demand, including but not limited to forecast peak demand and appropriate load distribution.

¹ The appeals process is in the Reliability Standards Development Procedure: http://www.nerc.com/files/RSDP_V6_1_12Mar07.pdf.
January 14, 2011

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Kirit S. Shah	Ameren Services	1	Negative	<p>(2)R1.4.6 should be limited to single contingency events for the transfer capability values to have meaning. System performance deficiencies for multiple contingency events can be mitigated by dropping of system load under the existing TPL standards.</p> <p>(3)R1.4.8 should be added to cover distribution factor cutoff assumptions.</p> <p>(4)The Purpose statement should be modified to include that Transfer capability is not a single value and is dependent on the selection and participation of sources and sinks on the defined transmission system. A multitude of assumptions goes into the development of the power system model, and the transfer capability study/assessment assumptions need to be discussed and documented.</p> <p>(5)As one of the benefits of transfer capability testing and analysis is tracking/trending. Therefore, a definition also need to be developed and included for Long-Term Transmission Planning Horizon. This would allow comparison of transfer capabilities in the near-term as well as long-term planning horizons.</p>
<p>Response: FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The SDT does not believe it is appropriate to specify load level, contingency events, nor cut off factors to be used in the assessment.</p>				
Steven Norris	APS	3	Negative	<p>1) FAC-013-2 appears to duplicate assessment study work required in MOD-001. The MOD-001, MOD-028, MOD-029, and MOD-030 standards essentially require that entities have a methodology and perform an Available Transfer Capability Assessment, with potential of also having to perform a Total Transfer Capability assessment, with no defined date-range which, for some utilities, will be up to 10 years. FAC-013-2 requires entities perform a Transfer Capability assessment for years 1-5, thereby making FAC-013-2 a duplicative process.</p> <p>2) It is not clear if an entity would have to perform yearly TTC studies for all paths or whether an entity could access each path yearly and determine if a need existed for a restudy of the TTC for a particular path.</p>
Mel Jensen	APS	5	Negative	
Robert D Smith	Arizona Public Service Co.	1	Negative	
Justin Thompson	Arizona Public Service Co.	6	Negative	
<p>Response: The SDT recognizes that FAC-013-2 may use the same study work that is used in MOD-029-1; that would not be true for entities that use MOD-028-1 and MOD-030-2. Regardless, the methodologies in the MOD standards DO have a defined date range (the Operations Planning horizon). FAC-013-2 has a different date range (the Near-term Planning horizon). Therefore the standards are not duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the study work is the same study work that is used in MOD-029-1. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The MOD Standards do not afford such flexibility</p>				

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Venkataramakrishnan Vinnakota	BC Hydro	2	Negative	The SDT is to be commended for their efforts to respond to FERC directions and input from NERC members to combine the standards FAC-012 and FAC-013 in to a single document to cover transfer capabilities in the planning horizon. However, BC Hydro is voting no on this ballot.
Pat G. Harrington	BC Hydro and Power Authority	3	Negative	
Clement Ma	BC Hydro and Power Authority	5	Negative	
Gordon Rawlings	BC Transmission Corporation	1	Negative	Based on existing standards BC Hydro has already established transfer capability and SOL methodologies for both the operating and planning horizons under the existing FAC-010 - 013 standards. We believe there is no value added in the creation of new terminology and processes used to calculate Planning Transfer Capabilities. The introduction of this new terminology and possibly new processes to determine PTCs may undermine efforts taken by utilities to become compliant with the existing standards, introduces duplication and potential for confusion, and ultimately detract from the common goals of increased reliability.
Response: The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. Regardless, the methodology in FAC-013-2 has a different date range (the Near-term Planning horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the effort is the same work that is used in other standards. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The MOD and TPL Standards do not afford such flexibility.				
Donald S. Watkins	Bonneville Power Administration	1	Negative	Please refer to BPA formal comments submitted on 1/7/11
Rebecca Berdahl	Bonneville Power Administration	3	Negative	
Francis J. Halpin	Bonneville Power Administration	5	Negative	
Response: Please refer to response to comments in Consideration of Comments on FAC-013-2				
Gregory Van Pelt	California ISO	2	Negative	Reference the IRC Standards Review Committee Comments. Also Reference the WECC comments in their recommendation and note that while we generally agree with the WECC in that improvements have been made, we do not agree in approving a standard with known deficiencies or conflicts. Neither do we agree with adding the Requirement 6.
Response: Please refer to response to comments in Consideration of Comments on FAC-013-2				
Chang G Choi	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	1	Negative	Based on our analysis of the proposed FAC-013-2 revisions and subsequent discussions, Tacoma Power is voting Negative on the FAC-013-2 ballot for the following reasons: 1) The currently balloted standard & requirements should apply to RC and/or entities

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Max Emrick	City of Tacoma, Department of Public Utilities, Light Division, dba Tacoma Power	5	Negative	<p>with major, critical transfer paths, not a system that is primarily a load serving system. We think the existing FAC-012-1 & FAC-013-1 describe the applicability with appropriate clarity. The revision should retain the applicability provisions as they exist in the existing standards FAC-012-1 & FAC-013-1.</p> <p>2) We believe all the requirements in the balloted standard are duplicative and are already covered by the requirements in TPL-001 thru TPL-004, FAC-010, & FAC-014. Therefore, this created a possibility for multiple fines on a single offense. It is not best practices to substantially repeat requirements from other standards, difficulties with subsequent revisions in multiple standards, and concerns about double-jeopardy.</p> <p>3) Lastly, the revision is written too ambiguous and subject to multiple interpretations. Thank you for your consideration.</p>
<p>Response: 1.The applicability was assigned to the PC because of their generally wider area view and to be in accord with a FERC directive.</p> <p>2. The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. Regardless, the methodology in FAC-013-2 has a different date range (the Near-term Planning horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the effort is the same work that is used in other standards. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The MOD and TPL Standards do not afford such flexibility.</p> <p>3. The comment lacks sufficient specificity for the SDT to render a response.</p>				
Paul Morland	Colorado Springs Utilities	1	Negative	<p>We suggest writing FAC-013-2 as a Transfer Capability methodology only, and let the entities with a need to determine Transfer Capabilities in the Planning Horizon apply the methodology in a Planning Horizon year of their choosing. According to the December 9, 2010 White Paper for FAC-013-2, there is a desire to "add to the portfolio of knowledge for planning for future reliable operation of the BES" and "to identify potential future weaknesses in the system." We suggest a Transfer Capability assessment belongs in the new draft TPL-001-2 where it could be studied in one of the Near-Term TPL studies, and where past Transfer Capability studies (as qualified in R2.6 of TPL-001-2 Draft 6) would be acceptable under the test for no material changes in the system</p>
<p>Response: 1.The SDT believes the Standard is consistent with your comments and applies to the Near Term Planning Horizon.</p> <p>2. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p>				
Christopher L de Graffenried	Consolidated Edison Co. of New York	1	Negative	See detailed comments submitted to NERC website
Peter T Yost	Consolidated Edison Co. of New York	3	Negative	

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	York			
Wilket (Jack) Ng	Consolidated Edison Co. of New York	5	Negative	
Nickesha P Carrol	Consolidated Edison Co. of New York	6	Negative	

Response: Please refer to response to comments in Consideration of Comments on FAC-013-2

Henry Ernst-Jr	Duke Energy Carolina	3	Affirmative	<p>Duke Energy appreciates the work of the drafting team and offers the following clarifying changes for further improvement to the standard.</p> <ol style="list-style-type: none"> 1. Adoption of the Near-Term Transmission Planning Horizon definition from the TPL-001-2 standard development will also require adoption of the definition of Year One which is part of the Near-Term Transmission Planning Horizon definition. 2. The VSLs for R2 are incorrect. The paragraph after the "OR" in the Lower VSL is not a violation. To correct this, replace the paragraph after the "OR" in the Lower VSL with the corresponding paragraph from Moderate. Likewise, move the paragraph after the "OR" in Higher to Moderate. Also, modify the paragraph after the "OR" in High to make it 90 to 120 days. Then add a new paragraph after the "OR" in Severe, making it more than 120 days after receipt of a request. 3. As written, R2.2 is hard to follow. Suggest rewriting as follows: "Distribute the results of the annual assessment of Transfer Capabilities to any other functional entity that has a reliability-related need, within 30 days of receiving a written request." 4. As written, R4 could possibly allow the Planning Coordinator to conduct an assessment based on a simulation that has not been updated. We believe the intent was to require a simulation to be performed each calendar year and assessment conducted based on that simulation. To clarify the intent, suggest rewriting as follows: "During each calendar year, each Planning Coordinator shall conduct simulations and document an assessment based on those simulations in accordance with its Transfer Capability Methodology for at least one year in the Near-Term Transmission Planning Horizon."
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Response:

1. The SDT agrees and has made the suggested changes.
2. The SDT agrees and has made the suggested changes.
3. R2.2 The SDT agrees with the intent of the proposed language and has incorporate it into the standard – R2, Part 2.2 was modified to clarify that this is requiring distribution of the methodology to entities with a reliability-related need for this; R5 was modified to clarify that the assessment results must be

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<p>shared with entities that have a reliability-related need for that information, subject to confidentiality rules. 4. R4. The SDT agrees with the proposed language in R4 and will incorporate it into the standard</p>				
Frank Gaffney	Florida Municipal Power Agency	4	Negative	Although the Standard Drafting Team (SDT) has made very significant improvements to the standard, there are a few items that ought to be "fixed".
David Schumann	Florida Municipal Power Agency	5	Negative	* R2 is confusing. The main requirement requires distribution of the methodology; however, bullet 2.2 requires distribution of the results. Which is it? It would seem bullet 2.2 needs to be redrafted to refer to the methodology since the distribution of results is in R5.
Richard L. Montgomery	Florida Municipal Power Agency	6	Negative	
Thomas W. Richards	Fort Pierce Utilities Authority	4	Negative	* R5 needs more clarity. It says that the PC must make the results available, but to whom? Due to CEII, we presume this is not for publishing on a web-site, so, we presume that the recipients would be the same as in R2, but, R5 should specifically say so. Would it make sense to move R4 to before R2 and combine R2 with R5 , and R3 with R6 and have R2/R5 and R3/R6 refer to both the methodology and results?
Stan T. Rzad	Keys Energy Services	1	Negative	
<p>Response: R2 - Thank you for your comments. R2.2 requires the distribution of the Planning Coordinator's Transfer Capability Methodology, not the assessment results. The SDT clarified the intent by modifying Part 2.2 to require distribution of the methodology to entities that have a reliability-related need for the methodology and modified R5 to clarify that the assessment results must be shared with entities that have a reliability-related need for the information, subject to confidentiality rules.</p> <p>R5. Each Planning Coordinator shall make the documented Transfer Capability assessment results available within 45 calendar days of the completion of the assessment to the recipients of its Transfer Capability Methodology pursuant to R2.1 and R2.2. However, if a functional entity that has a reliability related need for the results of the annual assessment of the Transfer Capabilities makes a written request for such an assessment after the completion of the assessment, the Planning Coordinator shall make the documented Transfer Capability assessment results available to that entity within 45 calendar days within receipt of the request</p> <p>Move R4 to before R2 and combine R2 with R5: The SDT believes the current ordering provides the best clarity. R1, R2 and R3 deal with the methodology and R4, R5 and R6 deal with the assessment.</p>				
Joseph S. Stonecipher	Beaches Energy Services	1	Negative	<p>Although the Standard Drafting Team (SDT) has made very significant improvements to the standard, there are a few items that ought to be "fixed":</p> <ol style="list-style-type: none"> 1. The definition now reads "The transmission planning period that covers year's one through five." Is "year one" the current year or the next year, e.g., doing a study in 2011, is "year one" 2011 or 2012? 2. "R2" is confusing: The main requirement requires distribution of the methodology; however, bullet 2.2 requires distribution of the results. Which is it? It would seem bullet 2.2 needs to be redrafted to refer to the methodology since the distribution of

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				<p>results is in R5.</p> <p>3. R5 needs more clarity. It says that the PC must make the results available, but to whom? Due to CEII, we presume this is not for publishing on a web-site, so, we presume that the recipients would be the same as in R2, but, R5 should specifically say so. Would it make sense to move R4 to before R2 and combine R2 with R5 , and R3 with R6 and have R2/R5 and R3/R6 refer to both the methodology and results? Anyway, this Standard needs some more work on it.</p>
<p>Response:</p> <p>1. The definition of Year One from the draft TPL-001-2 standard, which is used in the Near-Term Transmission Planning Horizon definition, will also be adopted in this standard which clarifies the assessment period.</p> <p>2. R2 - Thank you for your comments. R2.2 requires the distribution of the Planning Coordinator's Transfer Capability Methodology, not the assessment results. The SDT clarified the intent by modifying Part 2.2 to require distribution of the methodology to entities that have a reliability-related need for the methodology and modified R5 to clarify that the assessment results must be shared with entities that have a reliability-related need for the information, subject to confidentiality rules.</p> <p>3. R5. Each Planning Coordinator shall make the documented Transfer Capability assessment results available within 45 calendar days of the completion of the assessment to the recipients of its Transfer Capability Methodology pursuant to R2.1 and R2.2. However, if a functional entity that has a reliability related need for the results of the annual assessment of the Transfer Capabilities makes a written request for such an assessment after the completion of the assessment, the Planning Coordinator shall make the documented Transfer Capability assessment results available to that entity within 45 calendar days within receipt of the request</p>				
Gregg R Griffin	City of Green Cove Springs	3	Negative	<p>R2 is confusing. The main requirement requires distribution of the methodology; however, bullet 2.2 requires distribution of the results. Which is it? It would seem bullet 2.2 needs to be redrafted to refer to the methodology since the distribution of results is in R5.</p> <p>R5 needs more clarity. It says that the PC must make the results available, but to whom? Due to CEII, we presume this is not for publishing on a web-site, so, we presume that the recipients would be the same as in R2, but, R5 should specifically say so.</p> <p>Would it make sense to move R4 to before R2 and combine R2 with R5 , and R3 with R6 and have R2/R5 and R3/R6 refer to both the methodology and results?</p>
<p>Response:</p> <p>R2 - Thank you for your comments. R2.2 requires the distribution of the Planning Coordinator's Transfer Capability Methodology, not the assessment results. The SDT clarified the intent by modifying Part 2.2 to require distribution of the methodology to entities that have a reliability-related need for the methodology and modified R5 to clarify that the assessment results must be shared with entities that have a reliability-related need for the information, subject to confidentiality rules.</p>				

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<p>R5. Each Planning Coordinator shall make the documented Transfer Capability assessment results available within 45 calendar days of the completion of the assessment to the recipients of its Transfer Capability Methodology pursuant to R2.1 and R2.2. However, if a functional entity that has a reliability related need for the results of the annual assessment of the Transfer Capabilities makes a written request for such an assessment after the completion of the assessment, the Planning Coordinator shall make the documented Transfer Capability assessment results available to that entity within 45 calendar days within receipt of the request</p> <p>Move R4 to before R2 and combine R2 with R5: The SDT believes the current ordering provides the best clarity. R1, R2 and R3 deal with the methodology and R4, R5 and R6 deal with the assessment.</p>				
Lee Schuster	Florida Power Corporation	3	Negative	The proposed definition for "Near-Term Transmission Planning Horizon" is "The transmission planning period that covers years one through five." This proposed definition is confusing in that the part "...covers year[s] one..." appears to overlap the operating time frame. The definition should be revised back to "...beyond 13 months..." to clarify when the Near-Term Transmission Planning Horizon starts.
<p>Response:</p> <p>1. The definition of Year One from the draft TPL-001-2 standard, which is used in the Near-Term Transmission Planning Horizon definition, will also be adopted in this standard which clarifies the assessment period.</p>				
Ajay Garg	Hydro One Networks, Inc.	1	Negative	Hydro One is casting a negative with the following comments:
David L Kiguel	Hydro One Networks, Inc.	3	Negative	<p>1. We thank the SDT for responding positively to the industry comments to remove the two terms Planning Transfer Capability and Planning Transfer Capability Methodology Document, and insert the appropriate wording into the requirements.</p> <p>2. However, the term "Transfer Capability Methodology" appears capitalized, implying that this is a defined term but this term is neither defined in the NERC Glossary nor being proposed in the standard as a new term. We note that this term is currently used in both FAC-012-1 and used in FAC-013-1 although not included in the NERC glossary.</p> <p>3. We do not have a concern with using this term to indicate that it is a documented methodology for use in performing an annual assessment of Transfer Capability in the Near-Term Transmission Planning Horizon, but it needs to be changed to lower case; or else this term needs to be defined. Our preference is lower case.</p> <p>4. Additionally, although we support the intent of Requirement R6 we suggest that it be revised to provide for the protection of the confidentiality of information and the PC's obligations, as follows: "If a recipient of a documented Transfer Capability assessment requests data to support the assessment, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request</p>

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				subject to the condition of established information confidentiality agreements in place."
<p>Response: 2 & 3. Agree. The SDT changed the capitalized word, "Methodology" to non-capitalized throughout the standard. 4. Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as "If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator's area regarding the disclosure of confidential and/or sensitive information."</p>				
Kim Warren	Independent Electricity System Operator	2	Negative	<p>We thank the SDT for your positive response to industry comments regarding Standard FAC-013-2, namely: by removing the terms "PTC" and "PTCMD" and by adding language that more appropriately addresses the calculation of Transfer Capability in the Near-Term Transmission Planning Horizon. The IESO submits two final matters requiring the SDT's consideration.</p> <p>First, the IESO is concerned that the term "Transfer Capability Methodology", which appears to be defined in the Standard (and is also currently used in FAC-012-1 and FAC-013-1), is not a defined term in the NERC glossary. The IESO recommends that the term "Transfer Capability Methodology" either be added to the NERC glossary, or modified in FAC-013-2 such that the word "methodology" is written entirely in lower case lettering. The latter approach would be consistent with that used in the recently approved standard PRC-006-1, where the description "UFLS entities" was established and used within the standard to avoid long-winded requirements that repeatedly refer to the same entities.</p> <p>Second, while the IESO generally supports the underlying rationale for Requirement R6, it must be further revised to respect the reality of there being differing (and potentially conflicting) data confidentiality provisions and regulatory environments across North America. The IESO recommends that an additional statement be added to Requirement R6, to the following effect: "Upon receiving a request by a recipient of a documented Transfer Capability assessment for data in support the assessment, a</p>

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				Planning Coordinator shall provide the requestor with such data within 45 calendar days. Notwithstanding the foregoing sentence, the provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator's area regarding the disclosure of confidential and/or sensitive information."
<p>Response:</p> <p>1. The SDT changed the capitalized word, "Methodology" to non-capitalized throughout the standard.</p> <p>2. Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as "If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator's area regarding the disclosure of confidential and/or sensitive information."</p>				
Michael Moltane	International Transmission Company Holdings Corp	1	Negative	As written, the standard should be changed to a NERC "guideline" or white paper. While it does "standardize" the calculation of transfer capabilities in that certain data must be considered, it does not put any bounds on the data selected by the PC for these studies. More importantly, the annual requirement for studies does not have any obligation to do anything with the results. If corrective actions were mandated, then a "requirement" would make sense. Without any requirement for corrective action, this standard is not meaningful.
<p>Response: The comments indicate that the standard is believed to be unnecessary for reliable planning. FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability "will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System." The standard drafting team is charged with addressing FERC's directives to the ERO and has sought to find an equally effective and efficient means to meet FERC's directive - while maximizing the benefit to reliable transmission system planning.</p>				
Kathleen Goodman	ISO New England, Inc.	2	Negative	Please refer to the comments submitted.
<p>Response: Please refer to response to comments in Consideration of Comments on FAC-013-2</p>				
Larry E Watt	Lakeland Electric	1	Negative	1. This standard requires further clarification. This clarification should be within the standard, not in the associated white paper.
Paul Shipps	Lakeland Electric	6	Negative	2. This standard is unnecessary to meet the reliability needs of the BPS.

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<p>Response: Comment 1 does not specify what element requires further clarification so the SDT is unable to respond.</p> <p>2. The comments indicate that the standard is believed to be unnecessary for reliable planning. FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.</p>				
Mace Hunter	Lakeland Electric	3	Negative	<p>FAC-013-2 lacks clarity, its VSLs are severe for what amounts to a long range sensitivity study, and the requirements should better match the purpose. The whitepaper adds some clarity; however, the clarity should be in the standard, not in associated white papers.</p> <p>It is unclear if the intent is to have the PC determine the amount of internal generation that can be replaced with external generation or if the PC should determine system upgrades using Transfer Capability as a consideration. These two studies would be approached differently and give different results. There are many reasons, beyond the two discussed, to perform TC determination.</p> <p>Recommend better refining of the purpose of the Transfer Capability Assessment to be performed. An example of a requirement that requires clarification: Requirement R1, Part R1.3 “A statement that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator’s planning practices.”, is intended to provide consistency in the performance of the assessment of transfer capability and the planning practices used in the evaluation of the reliability of the BES. Does this mean the PC perform category ‘D’ [per TPL-004 table 1] analysis for each transfer considered? It is recommended that the standard better spell out the minimum criteria used to limit the transfer.</p> <p>Finally, R2 – R5 have the PC distribute the methodology, assessment and assessment data beyond that which is necessary. Dissemination should be “on request.” While this standard supports reliability through an increase in awareness, other standards, applicable to the PC, ensure the entity has a “Plan” which ensures reliability. As this amounts to sensitivity study as part of the annual TPL based assessments the VSLs should be reduced.</p>
<p>Response: The SDT believes the VSLs are appropriate. The commenter appears to be referring to VRFs.</p> <p>FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The SDT does not believe it is appropriate to specify load level, contingency events, nor cut off factors to be used in the assessment.</p>				

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The SDT believes it is essential that adjacent Planning Coordinators be provided the assessment result. Dissemination on request does apply to other reliability related entities.				
Charles A. Freibert	Louisville Gas and Electric Co.	3	Negative	Comment on Project 2010-10 Negative Ballot LG&E and KU Energy continue to oppose the proposal. The Standard Drafting Team while making change from their last proposal, (which only received a 40 percent approval level), still failed to address several recommendations from commenters. The comments made by several parties but were dismissed by the SDT include: - The proposal is duplicative of already in place standards dealing with future transmission planning processes, - The standard requirements for stakeholder participations are already embedded in the Order 890 OATTs of participants. - Meeting the proposed requirements may be burdensome for participants and at the same time not enhance BES reliability
Response: FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability "will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System." The standard drafting team is charged with addressing FERC's directives to the ERO and has sought to find an equally effective and efficient means to meet FERC's directive - while maximizing the benefit to reliable transmission system planning.				
Terry Harbour	MidAmerican Energy Co.	1	Negative	The purpose and applicability of this standard should be assigned to the Transmission Service Provider since the assessment seems to deal with the analysis of system power transfers above approved firm transfers already accounted for in the existing TPL models and assessments.
Response: The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,..) and understanding the potential impact on facilities, (and thus reliability), is important to effective transmission planning. This is the responsibility of the Planning Coordinator not the TSP.				
Jason L Marshall	Midwest ISO, Inc.	2	Negative	While the standard represents an improvement by allowing the transfer capability to be calculated in year 1 and not years 2-5, we still generally disagree with the purpose. Transfer capabilities in the planning horizon are not useful for the reliable planning of the transmission system and/or any expansion plans. The current, approved TPL standards already provide system expansion requirements to assure reliable system performance with regard to firm transfer commitments, but not to limits that may exceed those firm commitments such as those that would be indicated in PTC calculations. Further, it must be noted that there are no TPL standards that require system expansion for maintenance of transfer capabilities above firm transfer commitments. As such, transfer capabilities in the planning horizon provide no additional information that can be used for system planning. In addition, transfer capabilities calculated 2 to 5 years ahead are not useful to give system operators advance warning or appropriate, applicable operating limits because operating horizon conditions will be significantly

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				<p>different than those projected during the planning horizon (2 to 5 years previously). R6 is an unnecessary administrative requirement that provides no reliability benefit. It attempts to implement the open access concepts of transparency and comparability by allowing a third party to repeat or mimic the Planning Coordinator's calculations. It is strictly a commercial issue and simply does not belong in enforceable reliability standards. Further, it presumes that the Planning Coordinator is not able to perform its function and that compliance monitoring and enforcement processes of NERC and the Regional Entities will not detect deficiencies which will result in mitigation plans to correct deficiencies. Furthermore, some entities simply cannot have the data without violating FERC standards of conduct and data confidentiality policies.</p> <p>For bullet 1.2, do only the SOLs in the planning horizon governed by FAC-011-2 apply or do those in the operating horizon also apply? Since the standard applies to the planning horizon, it should only be planning SOLs. Furthermore, this bullet is administrative in nature and should be modified. A statement that SOLs shall be respected provides no reliability value.</p> <p>How does an entity prove compliance with R3? How does it prove it did not receive comments from a recipient of the methodology? R3 should be removed from the standard as it is an administrative requirement that is unnecessary, contrary to the results-based standards. What value does it provide other than to make third parties feel like they can force a response to their input? Transfer capability calculations have been performed for so long and are so well understood by industry, it is hard to fathom a third party providing any valuable technical input that a Planning Coordinator has not already considered. This requirement presumes that the Planning Coordinator may not be capable of performing the function for which they are registered and certified. It further presumes that NERC and Regional Entities' Compliance Monitoring and Enforcement Processes will not be able to identify deficiencies with complying with Requirement R1.</p> <p>Furthermore, the requirement to respond to all technical comments and/or revise the methodology would be a significant administrative burden to the Planning Coordinators. Part 2.2 should be either be removed due to its subjective nature or criteria for requesting such data should be added to clarify what entities can request such data, under what circumstances they can do so, and how disputes regarding such requests are to be resolved. More specifically, R3 contains no indication regarding the entity that makes the determination that a functional entity had a reliability-related need to the results of the annual assessment of Transfer Capabilities.</p> <p>In R1, the term Transfer Capability Methodology is used and capitalized. It does not have a current definition in the NERC glossary and the SDT did not propose a</p>

Balloter	Entity	Segment	Vote	Comment
				definition. It should be defined or made lower case.

Response:

The purpose of the standard is to focus **more** on the limiting facilities that are identified under the stress of specific energy transfers, rather than the specific values. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,..) and understanding the potential impact on facilities, (**and thus reliability**), is important to effective transmission planning. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future. FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.

For R1.2, the SOLs could be either the planning horizon or the operating horizon. R1.2 requires a “statement that the assessment shall respect known System Operating Limits (SOLs).” Although the standard applies to the planning horizon, good planning practice may require operating horizon SOLs if the SOLs are known and the SOLs could impact the planning horizon; therefore the SDT does not believe that it should only be planning SOLs. Whether R1.2 is “is administrative in nature” or not, it ensures that Planning Coordinators must include known SOLs or suffer a penalty for not including them. The SDT believes that including known SOLs does have reliability value.

“How does an entity prove compliance with R3?” As stated in M3, “Each Planning Coordinator shall have evidence, such as dated e-mail or dated transmittal letters, that the Planning Coordinator provided a written response to that commenter in accordance with Requirement R3.” “How does it prove it did not receive comments from a recipient of the methodology?” In the standard’s Data Retention section, “The Planning Coordinator shall retain evidence to show compliance with Requirements R3, R4, R5 and R6 for the most recent assessment.” The evidence could include a written attestation before an audit to confirm that it had not received any comments.

The SDT does not believe that “R3 should be removed from the standard as it is an administrative requirement that is unnecessary, contrary to the results-based standards.” Requiring the Planning Coordinator to respond to commenters is necessary as it may lead to changes in the methodology; at the very least, it makes the methodology more transparent to all NERC registered functional entities. The SDT does not agree that Planning Transfer Capability methods are well understood or transparent to all NERC registered functional entities that may comment. R3 does not presume “that the Planning Coordinator may not be capable of performing the function for which they are registered and certified” nor does it presume “that NERC and Regional Entities’ Compliance Monitoring and Enforcement Processes will not be able to identify deficiencies.” It does presume that NERC registered functional entities may need greater transparency on the methodology. It is unclear if R3 “would be a significant administrative burden to the Planning Coordinators.” If R3 does become a significant administrative burden to some Planning Coordinators, then it would indicate that their methodology is not transparent to other reliability

Baller	Entity	Segment	Vote	Comment
related entities.				
James D Burley	Midwest Reliability Organization	10	Negative	The commission has indicated that the FAC-013 should be applicable to Reliability Coordinators. The process and criteria used to determine transfer capabilities must be consistent with the process and criteria used for other users of the Bulk-Power System. Simply stated, the criteria used to calculate transfer capabilities for use in determining ATC must be identical to those used in planning and operating the system. The commission has ruled twice as to the position (Paragraphs 782&785 of the FERC order 693 and the paragraph 278 of the.)The current draft of the standard FAC-013-2 does not reflect the commission's position therefore the MRO has voted negative.
Response: The SDT believes that the FAC-013-02 reflects FERCs current position. Subsequent to FERC order 693, Order 729, at Paragraph 290, FERC directed that FAC 013-02 be applicable to the Planning Coordinator and not the Reliability Coordinator.				
Gregory Campoli	New York Independent System Operator	2	Negative	see comments provided.
Response: Please refer to response to comments in Consideration of Comments on FAC-013-2				
Robert Matthey	Ohio Valley Electric Corp.	1	Negative	Two sub-requirements (1.2 and 1.3) reference the inclusion of "statements" that something will be done. It seems inappropriate to have the inclusion of "statements" as requirements rather than just listing what reliability items must be considered.
Response: Statement such as those referenced are a means of ensuring that required practices are included in the Planning Coordinator's documented methodology.				
John C. Collins	Platte River Power Authority	1	Negative	We suggest writing FAC-013-2 as a Transfer Capability methodology only, and let the entities with a need to determine Transfer Capabilities in the Planning Horizon apply the methodology in a Planning Horizon year of their choosing. According to the December 9, 2010 White Paper for FAC-013-2, there is a desire to "add to the portfolio of knowledge for planning for future reliable operation of the BES" and "to identify potential future weaknesses in the system." We suggest a Transfer Capability assessment belongs in the new draft TPL-001-2 where it could be studied in one of the Near-Term TPL studies, and where past Transfer Capability studies (as qualified in R2.6 of TPL-001-2 Draft 6) would be acceptable under the test for no material changes in the system (don't force an annual assessment).
Carol Ballantine	Platte River Power Authority	6	Negative	
Response: 1.The SDT believes the Standard is consistent with your comments and applies to the Near Term Planning Horizon. 2. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future. The SDT believes that it is important to run simulations annually to ensure no changes outside the Planning Coordinator's system will impact the assessment result.				

Baloter	Entity	Segment	Vote	Comment
Terry L Baker	Platte River Power Authority	3	Negative	Much confusion between "Transfer Capabilities" and "SOLs" was introduced in the beginning. NERC planned to reduce this confusion by retiring FAC-012 and -013 along with implementation of the new MOD standards. The proposed FAC-013-2 fuels more confusion and is not necessary. We have FAC-010-2.1 that addresses the SOL methodology to be used by those calculating transfer capabilities in the Planning Horizon.
<p>Response: FERC Order 729 addressed these issues and determined in paragraph 290 that the assessment of transfer capability "will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System." NERC is charged with addressing FERC's directives and the standard drafting team has sought to find an equally effective and efficient means to meet FERC's directives - while maximizing the benefit to reliable transmission system planning.</p>				
Sammy Roberts	Progress Energy Carolinas	1	Negative	The proposed definition for "Near-Term Transmission Planning Horizon" is "The transmission planning period that covers years one through five." This proposed definition is confusing in that the part "...covers year[s] one..." appears to overlap the operating time frame. The definition should be revised back to "...beyond 13 months..." to clarify when the Near-Term Transmission Planning Horizon starts.
Sam Waters	Progress Energy Carolinas	3	Negative	
Wayne Lewis	Progress Energy Carolinas	5	Negative	
<p>Response: The definition of Year One from the draft TPL-001-2 standard, which is used in the Near-Term Transmission Planning Horizon definition, will also be adopted in this standard which clarifies the assessment period.</p>				
Henry E. LuBean	Public Utility District No. 1 of Douglas County	4	Negative	We agree with others that there is a conflict between the purpose statement and the title of the standard, as well as a concern regarding the potential for double jeopardy given that the requirements of the proposed FAC-013-2 are duplicative with other standards. We suggest, along with others, that it would be more appropriate to incorporate the requirement of this proposed standard into the appropriate section of FAC-010, FAC-014, and the TPL Planning Standards.
<p>Response:</p> <p>The SDT is not certain of the conflict but the Purpose has been modified to better align with the content of the standard.</p> <p>The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. With regard to double jeopardy, the methodology in FAC-013-2 has a different date range (the Near-term Planning horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the effort is the same work that is used in other standards.</p>				
Greg Lange	Public Utility District No. 2 of Grant County	3	Negative	We still believe this standard to be redundant and unnecessary. If we are already required to have a methodology to calculate SOL's for transmission in our coordinator area, then this standard provides no additional system reliability. This is just another example of additional paper work burden with no material benefit.
<p>Response: The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. With regard to redundancy, the methodology in FAC-013-2 has a different date range (the Near-term Planning horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC</p>				

Baloter	Entity	Segment	Vote	Comment
entities; even if some of the effort is the same work that is used in other standards.				
Robert Kondziolka	Salt River Project	1	Negative	SRP finds 3 problems with the proposed FAC-013-2 R4: 1. The current version states that the Transfer Capability assessment must be done "During each calendar year..." There is ambiguity in that it doesn't specifically state that simulations don't have to be run each year for every year in the Near Term Planning Horizon. It should be clear from a Compliance perspective that simulations are only required to be run if required by the entity's Transfer Capability Methodology 2. The current version states that the assessment is based on the simulations performed "...for at least one year in the Near-Term Transmission Planning Horizon." a. This means that the assessment should review a simulation associated with one year within the Near-Term Planning Horizon. As a result, a simulation must be run a minimum of once every 5 years even if there are no system changes that would impact simulation assumptions. This may not be necessary. b. The requirement states that any simulation that represents the system condition within the Near-Term Planning Horizon can be used for assessment. How is it determined which simulation is used? This does not link the chosen simulation to any reliability concern. 3. The current version does not require specific product requirements from the assessment. In other words, if the assessment was done, and adjustments to Transfer Capability were identified, the Standard does not specifically require that the adjustments be noted and provided to the entities that receive the assessment.
John T. Underhill	Salt River Project	3	Negative	
Glen Reeves	Salt River Project	5	Negative	

Response:

R4. The SDT agrees with the concern that R4 requires modification and has incorporated appropriate changes into the standard.

1&2a The SDT believes that it is important to run simulations annually to ensure no changes outside the Planning Coordinator's system will impact the assessment result.

2b FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system.

3. The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers, rather than the specific values.

Baller	Entity	Segment	Vote	Comment
Charles H Yeung	Southwest Power Pool	2	Negative	SPP votes no because we support the ISO RTO SRC comments for this standard. We believe there are too many outstanding issues the SDT needs to address - and should be addressed prior to taking a ballot.
<p>Response: Please see our response to the ISO RTO SRC comments for this standard.</p>				
Travis Metcalfe	Tacoma Public Utilities	3	Negative	Tacoma Power is voting Negative. Based on our analysis of the proposed FAC-013-2 revisions and subsequent discussions today:
Keith Morisette	Tacoma Public Utilities	4	Negative	1) The currently balloted standard & requirements should apply to RC and/or entities with major, critical transfer paths, not a system that is primarily a load serving system. We think the existing FAC-012-1 & FAC-013-1 describe the applicability with appropriate clarity. The revision should retain the applicability provisions as they exist in the existing standards FAC-012-1 & FAC-013-1.
Michael C Hill	Tacoma Public Utilities	6	Negative	2) We believe all the requirements in the balloted standard are duplicative and are already covered by the requirements in TPL-001 thru TPL-004, FAC-010, & FAC-014. Therefore, this created a possibility for multiple fines on a single offense. It is a poor practice to substantially repeat requirements from other standards, difficulties with subsequent revisions in multiple standards, and concerns about double-jeopardy. 3) Lastly, the revision is written too ambiguous and subject to multiple interpretations. Thank you for your consideration.
<p>Response: 1. The applicability was assigned to the PC because of their generally wider area view and to be in accord with a FERC directive. If the entity is a registered PC they must comply. 2. The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. With regard to double jeopardy, the methodology in FAC-013-2 has a different date range (the Near-term Planning horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the effort is the same work that is used in other standards. 3. The comment lacks sufficient specificity for the SDT to render a response.</p>				
Ronald L Donahey	Tampa Electric Co.	3	Negative	R2 is confusing. The main requirement requires distribution of the methodology; however, bullet 2.2 requires distribution of the results. Which is it? It would seem bullet 2.2 needs to be redrafted to refer to the methodology since the distribution of results is in R5.
<p>Response: R2.2 requires the distribution of the Planning Coordinator's Transfer Capability Methodology, not the assessment results. The SDT clarified the intent by modifying Part 2.2 to require distribution of the methodology to entities that have a reliability-related need for the methodology and modified R5 to clarify that the assessment results must be shared with entities that have a reliability-related need for the information, subject to confidentiality rules.</p>				

Baloter	Entity	Segment	Vote	Comment
Keith V. Carman	Tri-State G & T Association, Inc.	1	Negative	Tri-State's has submitted comments to support the negative vote through the electronic form provided on the Project 2010-10 Standards page.
Janelle Marriott	Tri-State G & T Association, Inc.	3	Negative	Reference Tri-State Generation and Transmission Assn., Inc. Formal comments submitted to NERC electronically via the Project 2010-10 FAC Order 729 Formal Comment link.
Response: Please refer to response to comments in Consideration of Comments on FAC-013-2.				
John Tolo	Tucson Electric Power Co.	1	Negative	There is a conflict between the purpose statement and the title of the standard, as well as a concern regarding the potential for double jeopardy given their belief that the requirements of the proposed FAC-013-2 are duplicative with other standards. It is suggested that it would be more appropriate to incorporate the requirement of this proposed standard into the appropriate section of FAC-010, FAC-014, and the TPL Planning Standards. thank you
Response: The SDT is not certain of the conflict but the Purpose has been modified to better align with the content of the standard. The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. With regard to double jeopardy, the methodology in FAC-013-2 has a different date range (the Near-term Planning horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the effort is the same work that is used in other standards.				
Jonathan Appelbaum	United Illuminating Co.	1	Affirmative	UI would prefer the proper purpose statement to be: "To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of the ability to transfer energy (in the Near-Term Transmission Planning Horizon)."
Response: The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers. The purpose of the statement has been modified accordingly.				
Brandy A Dunn	Western Area Power Administration	1	Negative	FAC-013-2 seems to be intended to be a Transfer Capability methodology only. The entities with a need to determine Transfer Capabilities in the Planning Horizon apply the methodology in a Planning Horizon year of their choosing. According to the December 9, 2010 White Paper for FAC-013-2, there is a desire to "add to the portfolio of knowledge for planning for future reliable operation of the BES" and "to identify potential future weaknesses in the system." We also suggest a Transfer Capability assessment belongs in the new draft TPL-001-2 where it could be studied in one of the Near-Term TPL studies, and where past Transfer Capability studies (as qualified in R2.6 of TPL-001-2 Draft 6) would be acceptable under the test for no material changes in the system (don't force an annual assessment).
Response: 1.The SDT believes the Standard is consistent with your comments and applies to the Near Term Planning Horizon. 2. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.				

Baloter	Entity	Segment	Vote	Comment
Louise McCarren	Western Electricity Coordinating Council	10	Affirmative	We agree that the requirements of proposed FAC-013-2 pose no threat to reliability and, in fact, are beneficial to reliability. However, we also believe that the requirements of proposed FAC-013-2 are duplicative of the efforts required by FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004. For clarity and ease of implementation, the requirements of proposed FAC-013-2 should be incorporated as new requirements or added into the appropriate requirements of existing standards FAC-010, FAC-014, and the TPL Planning Standards. The efforts to implement FERC's directives into the TPL-001 through TPL-004 planning standards have resulted in clarification of multiple sensitivities that must be considered when conducting the Transmission Assessments required by the new TPL-001-1 planning standard. The information gleaned by conducting and assessing these sensitivity studies would provide the Planning Coordinator with the same information regarding the impact of system changes on their Transfer Capability as obtained by meeting the requirements in the proposed FAC-013-2. Because some entities my vote in the negative for FAC-013-2 out of concerns related to double jeopardy for any potential violations of the proposed FAC-013-2 and currently existing standards, incorporating the requirements of FAC-013-2 into the appropriate existing standards may be more acceptable to the industry.
<p>Response The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. Regardless, the methodology in FAC-013-2 has a different date range (the Near-term Planning horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the effort is the same work that is used in other standards. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The MOD and TPL Standards do not afford such flexibility.</p>				
Gregory L Pieper	Xcel Energy, Inc.	1	Negative	Please refer to Xcel Energy's detailed comments submitted concurrently
Michael Ibold	Xcel Energy, Inc.	3	Negative	
Liam Noailles	Xcel Energy, Inc.	5	Negative	
David F. Lemmons	Xcel Energy, Inc.	6	Negative	
<p>Response Please refer to response to comments in Consideration of Comments on FAC-013-2.</p>				