

Summary Consideration:

Only one negative comment was submitted with a ballot on this standard, suggesting that the levels of non-compliance may not be appropriate. Most comments indicated format errors that appeared in the posted version of the standard. These format errors have been corrected as errata.

The drafting team corrected errata, but did not make any content changes to this standard.

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 the Vice President and Director of Standards, Gerry Cauley at 609-452-8060 or at gerry.cauley@nerc.net. In addition, there is a NERC Reliability Standards Appeals Process.¹

Company	Balloter	Vote	Comments
Detroit Edison	Ronald Bauer	No	Not convinced that the Level 1 and Level 2 of Non-compliance are appropriate since it is essential that documentation address these issues. Maybe only need level 3 and 4 compliance for this standard.
Response: When this was last posted for comment, most stakeholders who participated in the comment process seemed to support the proposed levels of non-compliance.			
American Transmission Company LLC ATC	Peter Burke	Yes	In the Clean copy of this standard there is no Requirement 3. The SDT should review the Clean copy and determine if the requirement labeling is correct.
Response: The format errors have been corrected.			
Great River Energy GRE	Gordon Pietsch	Yes	Non-complaint item 2.3 (level 3) is redundant with item 2.4 (level 4) and should be removed. The effective date should be 9 months after BOT adoption as the regions have a heavy work load already in 2006. R3 heading is missing
Response: There is a difference between level 3 non-compliance (no evidence documentation was distributed as required) and level 4 non-compliance (no documentation). An entity may have documentation but may have either failed to distribute it to some or all of the entities required. MOD-016-1 includes proposed revisions to the already approved MOD-016. Entities should already be compliant with most of the requirements – and 6 months should be long enough to become compliant with the elements that were added from Phase III & IV.			

¹ The appeals process is in the Reliability Standards Process Manual: <http://www.nerc.com/standards/newstandardsprocess.html>.

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Company	Balloter	Vote	Comments
Hydro One Networks Inc.	Ajay Garg	Yes	The requirements in this standard state that the RRO shall distribute the documentation "upon approval." The use of the term "approval" needs clarification as to whose approval is required and on the timing of such approvals.
Response: The standard would remain the same no matter who approves the document. The intent was to ensure that the documents have some formal sign-off before being disseminated for use. The approval process does not have to be the same for all entities.			
Nebraska Public Power District NPPD	Alan Boesch	Yes	Effective date should be 9 months after BOT adoption as the Regions have a heavy workload already for 2006
Response: MOD-016-1 includes proposed revisions to the already approved MOD-016. Entities should already be compliant with most of the requirements – and 6 months should be long enough to become compliant with the elements that were added from Phase III & IV.			
New Brunswick Power Transmission Corporation	Wayne Snowdon	Yes	In R2 the Regional Reliability Organization (RRO) shall make a distribution within 30 calendar days to Planning Authorities "upon approval" and in R3 the Planning Authority is to make a distribution to their Transmission Planners and Load Serving Entities within their Area "upon approval". The approval needs clarification, it is not entirely clear who is approving this, is it internal approval? If it is a sequential approval by an overseeing entity there is a problem with timing (e.g. the TO can't give it to the TP and LSE within 30 days if the RRO uses up the 30 day window to release it to the TO).
Response: The standard would remain the same no matter who approves the document. The intent was to ensure that the documents have some formal sign-off before being disseminated for use. The approval process does not have to be the same for all entities. There is nothing in this standard that requires any sequential approval.			
PacifiCorp PAC	Robert Lawrence Williams	Yes	I agree that the reporting should be completed by the LSE, per the functional model. If a company has different approach, a delegation can be made.
Response: This standard does not include any requirements for the LSE.			
San Diego Gas & Electric Co. SDGE	Linda P Brown	Yes	SDG&E approves of this SAR, as long as the existing process by which the Balancing Authority (which is the CAISO for SDG&E) is able to submit the Actual and Forecast Demands, Net Energy for Load, and Controllable Demand-Side Management to the WECC.
Response: The drafting team is not in a position to make an interpretation about WECC procedures.			

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SaskPower SPC	Wayne Guttormson	Yes	SaskPower recommends that the effective date be 9 months after BOT adoption as the Regions have a heavy workload already for 2006, and that the Planning Authority be added to R1.
Response: MOD-016-1 includes proposed revisions to the already approved MOD-016. Entities should already be compliant with most of the requirements – and 6 months should be long enough to become compliant with the elements that were added from Phase III & IV.			
Midwest Independent Transmission System Operator, Inc.	Terry Bilke	Yes	While we are voting affirmative, we have concerns in that there is not a consensus in the industry on the role of the planning authority. Most of the V0 items that were passed just duplicated the tasks of the local planner. The role of the planning authority needs better definition. Two entities shouldn't be accountable for the same requirement.
Response: As envisioned the tasks are not necessarily duplicates they provide the opportunity for the Regional Reliability Organization and Planning Authority to coordinate their efforts to the extent that the Planning Authority can build off of the Regional Reliability Organization's document or the Planning Authority could simply distribute the RRO document without changes as the Planning Authority's document. The Planning Authority's document could be identical to the Regional Reliability Organization's document.			
Midwest Reliability Organization	William J. Head	Yes	Non-Compliance Item 2.3 (Level 3) is redundant with Item 2.4 (Level 4) and should be removed. Effective date should be 9 months after BOT adoption as the Regions have a heavy workload already for 2006. R3 heading is missing.
Response: There is a difference between level 3 non-compliance (no evidence documentation was distributed as required) and level 4 non-compliance (no documentation). An entity may have documentation but may have either failed to distribute it to some or all of the entities required.			
MOD-016-1 includes proposed revisions to the already approved MOD-016. Entities should already be compliant with most of the requirements – and 6 months should be long enough to become compliant with the elements that were added from Phase III & IV.			
Hydro One Networks Inc	Mike Penstone	Yes	The requirements in this standard state that the RRO shall distribute the documentation "upon approval." The use of the term "approval" needs clarification as to whose approval is required and on the timing of such approval.
Response: The standard would remain the same no matter who approves the document. The intent was to ensure that the documents have some formal sign-off before being disseminated for use. The approval process does not have to be the same for all entities.			
Lincoln Electric System LES	Bruce E Merrill	Yes	Non-Compliance Item 2.3 (Level 3) is redundant with Item 2.4 (Level 4) and should be removed. Effective date should be 9 months after BOT adoption as the Regions have a heavy workload already for 2006. R3 heading is missing.
Response: There is a difference between level 3 non-compliance (no evidence documentation was distributed as required) and level 4 non-compliance (no documentation). An entity may have documentation but may have either failed to distribute it to some or all of the entities required.			

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<p>MOD-016-1 includes proposed revisions to the already approved MOD-016. Entities should already be compliant with most of the requirements – and 6 months should be long enough to become compliant with the elements that were added from Phase III & IV.</p>			
Niagara Mohawk NMPC	Michael Schiavone	Yes	<p>In R2 the Regional Reliability Organization (RRO) shall make a distribution within 30 calendar days to Planning Authorities “upon approval” and in R3 the Planning Authority is to make a distribution to their Transmission Planners and Load Serving Entities within their Area “upon approval”. The approval needs clarification, it is not entirely clear who is approving this, is it internal approval? If it is a sequential approval by an overseeing entity there is a problem with timing (e.g. the TO can’t give it to the TP and LSE within 30 days if the RRO uses up the 30 day window to release it to the TO).</p>
<p>Response: The standard would remain the same no matter who approves the documents. The intent was to ensure that the documents have some formal sign-off before being disseminated for use. The approval process does not have to be the same for all entities. There is nothing in this standard that requires any sequential approval.</p>			
Lincoln Electric System LES	Dennis Florum	Yes	<p>Non-Compliance Item 2.3 (Level 3) is redundant with Item 2.4 (Level 4) and should be removed. Effective date should be 9 months after BOT adoption as the Regions have a heavy workload already for 2006. R3 heading is missing.</p>
<p>Response: There is a difference between level 3 non-compliance (no evidence documentation was distributed as required) and level 4 non-compliance (no documentation). An entity may have documentation but may have either failed to distribute it to some or all of the entities required.</p>			
<p>MOD-016-1 includes proposed revisions to the already approved MOD-016. Entities should already be compliant with most of the requirements – and 6 months should be long enough to become compliant with the elements that were added from Phase III & IV. The format error with R3 has been corrected.</p>			
California Energy Commission	William Mitchell Chamberlain	Yes 0	<p>While we are voting yes on this standard we are concerned that it should be clarified further in the future. It requires reporting by load serving entities but the term is not adequately defined in the standard. NERC's online glossary indicates that an LSE is anyone that secures generation and transmission services for end-users. This is vague and leaves the question who is actually required to complete data requests subject to each Region's interpretation. Because NERC is not proposing that the glossary be subject to standard setting process, MOD-016-1 creates an elastic requirement subject to NERC's ability to revise the glossary's terms to encompass as large or narrow a definition of load serving entity as they wish. We suggest this be reviewed in future drafting efforts on this standard.</p>
<p>Response: There are no requirements in the standard for the LSE. The requirement in this standard states that the RRO shall have a requirement for LSEs. The term, “Load-serving entity” was approved with Version 0 Standards. This definition cannot be changed without going through the same</p>			

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process used to revise a standard.			