

**Note:** A valid interpretation request is one that requests additional clarity about one or more requirements in approved NERC reliability standards, but does not request approval as to how to comply with one or more requirements.

When completed, email this form to:  
[laura.hussey@nerc.net](mailto:laura.hussey@nerc.net)  
 For questions about this form or for assistance in completing the form, call Laura Hussey at 404-446-2579.

Request for an Interpretation of a Reliability Standard	
Date submitted: 5/13/2011	
<b>Contact information for person requesting the interpretation:</b>	
Name:	Don McInnis
Organization:	Florida Power & Light
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<b>Identify the standard that needs clarification:</b>	
Standard Number (include version number, e.g. PRC-001-1): MOD-028-1	
Standard Title: Area Interchange Methodology	
<b>Identify specifically what requirement needs clarification:</b>	
Requirement Number and Text of Requirement: <b>R3.1</b> For on-peak and off-peak intra-day and next-day TTCs, use the following (as well as any other values and additional parameters as specified in the ATCID):	
<b>Identify the nature of clarification that is requested: (Check as many as applicable)</b>	
<input checked="" type="checkbox"/> Clarify the required performance <input checked="" type="checkbox"/> Clarify the conditions under which the performance is required <input type="checkbox"/> Clarify which functional entity is responsible for performing an action in a requirement <input type="checkbox"/> Clarify the reliability outcome the requirement is intended to produce	
Please explain the clarification needed:	
<i>By using the words "on-peak", "off-peak", and "intra-day" this requirement implies there would have to be separate TTC numbers for different portions of the current day. However, R5 of MOD28 establishes the calculation frequencies and only requires an update to TTC once within the 7 days prior to the specified period where they are used in an ATC calculation. The</i>	

*clarification needed is on the ATC Drafting Team's intent with respect to the quantity and timing of individual TTC calculations needed for use in the ATC calculations.*

**Identify the material impact associated with this interpretation:**

Identify the material impact to your organization or others, if known, caused by the lack of clarity or an incorrect interpretation of this standard.

*Adherence to the implied intra day calculation requirement of R3.1 is resulting in additional work and creating coordination issues with other parties which are not calculating intra day TTC values.*