Consideration of Comments

Project Name:	2018-03 Standards Efficiency Review Retirements
Comment Period Start Date:	2/27/2019
Comment Period End Date:	4/12/2019
Associated Ballots:	2018-03 Standards Efficiency Review Retirements FAC-008-4 IN 1 ST; 2018-03 Standards Efficiency Review Retirements FAC-013-2 IN 1 ST; 2018-03 Standards Efficiency Review Retirements INT-004-3.1 IN 1 ST; 2018-03 Standards Efficiency Review Retirements INT-006-5 IN 1 ST; 2018-03 Standards Efficiency Review Retirements INT-009-3 IN 1 ST; 2018-03 Standards Efficiency Review Retirements INT-010-2.1 IN 1 ST; 2018-03 Standards Efficiency Review Retirements IRO-002-6 IN 1 ST; 2018-03 Standards Efficiency Review Retirements MOD-001-1a IN 1 ST; 2018-03 Standards Efficiency Review Retirements MOD-001-2 IN 1 ST; 2018-03 Standards Efficiency Review Retirements MOD-004-1 IN 1 ST; 2018-03 Standards Efficiency Review Retirements MOD-008-1 IN 1 ST; 2018-03 Standards Efficiency Review Retirements MOD-020-0 IN 1 ST; 2018-03 Standards Efficiency Review Retirements MOD-028-2 IN 1 ST; 2018-03 Standards Efficiency Review Retirements MOD-029-2a IN 1 ST; 2018-03 Standards Efficiency Review Retirements MOD-030-3 IN 1 ST; 2018-03 Standards Efficiency Review Retirements PRC-004-6 IN 1 ST; 2018-03 Standards Efficiency Review Retirements TOP-001-5 IN 1 ST; 2018-03 Standards Efficiency Review Retirements VAR-001-6 IN 1 ST

There were 49 sets of responses, including comments from approximately 119 different people from approximately 81 companies representing the 10 Industry Segments as shown in the table on the following pages.

All comments submitted can 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 Senior Director of Engineering and Standards Howard Gugel (via email) or at (404) 446-9693.

Questions

1. SDT has determined that additional work is necessary to ensure the retirement of certain standard requirements does not create a reliability gap. The SDT recommends that these standards requirements be considered as part of the SER Phase II effort. These requirements include: BAL-005-1, Requirements R4 and R6; COM-002-4, Requirement R2; EOP-005-3, Requirement R8; EOP-006-3, Requirement R7; IRO-014-3, Requirement R3; IRO-017-1, Requirement R3; and VAR-001-5, Requirement R3. Do you agree with the SDT's recommendation that these standards requirements be considered as part of the SER Phase II effort? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation.

2. The SDT is proposing to take no action on two standards already scheduled for retirement: PRC-015-1, Requirements R1, R2 and R3; and PRC-018-1, Requirements, R1, R2, R3, R4, R5 and R6. Do you agree with the SDT's recommendation to take no action for these standards already scheduled for retirement? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation.

3. The SDT determined the following requirements are inappropriate for retirement because they serve a reliability benefit: IRO-002-5, Requirements R4 and R6; IRO-008-2, Requirement R6, and TOP-001-4, Requirements R16 and R17. Do you agree with the SDT's recommendation to retain these requirements? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation.

4. The SDT is proposing to retire FAC-008-3, Requirements R7 and R8. Do you agree with the SDT's proposal to retire these requirements? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

5. The SDT is proposing to retire FAC-013-2, Requirements R1, R2, R4, R5 and R6 (all). Do you agree with the SDT's proposal to retire FAC-013-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

6. The SDT is proposing to retire INT-004-3.1, Requirements R1, R2, and R3 (all). Do you agree with the SDT's proposal to retire INT-004-3.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

7. The SDT is proposing to retire INT-006-4, Requirements R3.1, R4, and R5. Do you agree with the SDT's proposal to retire Requirements R3.1, R4, and R5 of INT-006-4? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

8. The SDT is proposing to retire INT-009-2.1, Requirement R2. Do you agree with the SDT's proposal to retire Requirement R2 of INT-009-2.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

9. The SDT is proposing to retire INT-010-2.1, Requirements R1, R2, and R3 (all). Do you agree with the SDT's proposal to retire INT-010-2.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

10. The SDT is proposing to retire IRO-002-5, Requirement R1. Do you agree with the SDT's proposal to retire Requirement R1 of IRO-002-5? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

11. The SDT is proposing to retire MOD-004-1, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, and R12 (all). Do you agree with the SDT's proposal to retire MOD-004-1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

12. The SDT is proposing to retire MOD-008-1, Requirements R1, R2, R3, R4, and R5 (all). Do you agree with the SDT's proposal to retire MOD-008-1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

13. **The SDT is proposing to retire MOD-028-2, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, and R11 (all). Do you agree with the SDT's proposal to retire MOD-028-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.**

14. **The SDT is proposing to retire MOD-029-2a, Requirements R1, R2, R3, R4, R5, R6, R7, and R8 (all). Do you agree with the SDT's proposal to retire MOD-029-2a? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.**

15. **The SDT is proposing to retire MOD-030-3, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9 and R10 (all). Do you agree with the SDT's proposal to retire MOD-030-3? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.**

16. **The SDT is proposing to retire MOD-001-1a, Requirements R1, R2, R3, R4, R5, R6, R7, R8 and R9 (all). Do you agree with the SDT's proposal to retire MOD-001-1a? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.**

17. **The SDT is proposing to withdraw Reliability Standard, MOD-001-2, which is currently pending approval by applicable governmental authorities. Do you agree with the SDT's proposal to withdraw Reliability Standard MOD-001-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.**

18. **The SDT is proposing to retire MOD-020-0, Requirement R1 (all). Do you agree with the SDT's proposal to retire MOD-020-0? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.**

19. **The SDT is proposing to retire PRC-004-5(i), Requirement R4. Do you agree with the SDT's proposal to retire Requirement R4 of PRC-004-5(i)? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.**

20. The SDT is proposing to retire TOP-001-4, Requirements R19 and R22. Do you agree with the SDT's proposal to retire Requirements R19 and R22 of TOP-001-4? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

21. The SDT is proposing to retire VAR-001-5, Requirement R2. Do you agree with the SDT's proposal to retire Requirement R2 of VAR-001-5? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

22. Please provide any additional comments for the SDT to consider that have not already been provided in the questions above.

The Industry Segments are:

1 — Transmission Owners

2 — RTOs, ISOs

3 — Load-serving Entities

4 — Transmission-dependent Utilities

5 — Electric Generators

6 — Electricity Brokers, Aggregators, and Marketers

7 — Large Electricity End Users

8 — Small Electricity End Users

9 — Federal, State, Provincial Regulatory or other Government Entities

10 — Regional Reliability Organizations, Regional Entities

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Tennessee Valley Authority	Brian Millard	1,3,5,6	SERC	Tennessee Valley Authority	Kurtz, Bryan G.	Tennessee Valley Authority	1	SERC
					Grant, Ian S.	Tennessee Valley Authority	3	SERC
					Thomas, M. Lee	Tennessee Valley Authority	5	SERC
					Parsons, Marjorie S.	Tennessee Valley Authority	6	SERC
Douglas Webb	Douglas Webb		MRO,SPP RE	Westar-KCPL	Doug Webb	Westar	1,3,5,6	MRO
					Doug Webb	KCP&L	1,3,5,6	MRO
New York Independent System Operator	Gregory Campoli	2		ISO/RTO Standards Review Committee	Gregory Campoli	NYISO	2	NPCC
					Helen Lainis	IESO	2	NPCC
					Mark Holman	PJM Interconnection, L.L.C.	2	RF
					Charles Yeung	Southwest Power Pool, Inc. (RTO)	2	MRO
					Terry BIlke	Midcontinent ISO, Inc.	2	MRO
					Brandon Gleason	Electric Reliability	2	Texas RE

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
						Council of Texas, Inc.		
					Ali Miremadi	CAISO	2	WECC
					Kahtleen Goodman	ISO-NE	2	NPCC
Southwest Power Pool, Inc. (RTO)	Jim Williams	2	MRO,SERC,WECC	SPP Standards Review Group	Jim Williams	SPP	2	MRO
					Shannon Mickens	SPP	2	MRO
ACES Power Marketing	Jodirah Green	1,3,4,5,6	MRO,NA - Not Applicable,RF,SERC,Texas RE,WECC	ACES Standard Collaborations	Bob Solomon	Hoosier Energy Rural Electric Cooperative, Inc.	1	SERC
					Kevin Lyons	Central Iowa Power Cooperative	1	MRO
					Ginger Mercier	Prairie Power , Inc.	1,3	SERC
					Kagen DelRio	North Carolina Electric Membership Cooperative	3,4,5	SERC
					Tara Lightner	Sunflower Electric Power Cooperative	1	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Susan Sosbe	Wabash Valley Power Association	3	SERC
Entergy	Julie Hall	6		Entergy	Oliver Burke	Entergy - Entergy Services, Inc.	1	SERC
					Jamie Prater	Entergy	5	SERC
DTE Energy - Detroit Edison Company	Karie Barczak	3		DTE Energy - DTE Electric	Jeffrey Depriest	DTE Energy - DTE Electric	5	RF
					Daniel Herring	DTE Energy - DTE Electric	4	RF
					Karie Barczak	DTE Energy - DTE Electric	3	RF
Lincoln Electric System	Kayleigh Wilkerson	5		Lincoln Electric System	Kayleigh Wilkerson	Lincoln Electric System	5	MRO
					Eric Ruskamp	Lincoln Electric System	6	MRO
					Jason Fortik	Lincoln Electric System	3	MRO
					Danny Pudenz	Lincoln Electric System	1	MRO
Duke Energy	Kim Thomas	1,3,5,6	FRCC,RF,SERC	Duke Energy	Laura Lee	Duke Energy	1	SERC
					Lee Schuster	Duke Energy	3	FRCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Dale Goodwine	Duke Energy	5	SERC
					Greg Cecil	Duke Energy	6	RF
Southern Company - Southern Company Services, Inc.	Marsha Morgan	1,3,5,6	SERC	Southern Company	Katherine Prewitt	Southern Company Services, Inc	1	SERC
					Jennifer Sykes	Southern Company Generation and Energy Marketing	6	SERC
					R Scott Moore	Alabama Power Company	3	SERC
					William Shultz	Southern Company Generation	5	SERC
Manitoba Hydro	Mike Smith	1		Manitoba Hydro	Yuguang Xiao	Manitoba Hydro	5	MRO
					Karim Abdel-Hadi	Manitoba Hydro	3	MRO
					Blair Mukanik	Manitoba Hydro	6	MRO
					Mike Smith	Manitoba Hydro	1	MRO

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
Eversource Energy	Quintin Lee	1		Eversource Group	Sharon Flannery	Eversource Energy	3	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
Northeast Power Coordinating Council	Ruida Shu	1,2,3,4,5,6,7,8,9,10	NPCC	RSC no Dominion, Con-Edison	Guy V. Zito	Northeast Power Coordinating Council	10	NPCC
					Randy MacDonald	New Brunswick Power	2	NPCC
					Glen Smith	Entergy Services	4	NPCC
					Brian Robinson	Utility Services	5	NPCC
					Alan Adamson	New York State Reliability Council	7	NPCC
					David Burke	Orange & Rockland Utilities	3	NPCC
					Michele Tondalo	UI	1	NPCC
					Helen Lainis	IESO	2	NPCC
					Michael Jones	National Grid	3	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Sean Cavote	PSEG	4	NPCC
					Kathleen Goodman	ISO-NE	2	NPCC
					David Kiguel	Independent	NA - Not Applicable	NPCC
					Silvia Mitchell	NextEra Energy - Florida Power and Light Co.	6	NPCC
					Paul Malozewski	Hydro One Networks, Inc.	3	NPCC
					Gregory Campoli	New York Independent System Operator	2	NPCC
					Caroline Dupuis	Hydro Quebec	1	NPCC
					Chantal Mazza	Hydro Quebec	2	NPCC
					Laura McLeod	NB Power Corporation	5	NPCC
					Nick	Kowalczyk	1	NPCC
					John Hastings	National Grid	1	NPCC

Organization Name	Name	Segment(s)	Region	Group Name	Group Member Name	Group Member Organization	Group Member Segment(s)	Group Member Region
					Joel Charlebois	AESI - Acumen Engineered Solutions International Inc.	5	NPCC
					Quintin Lee	Eversource Energy	1	NPCC
					Mike Cooke	Ontario Power Generation, Inc.	4	NPCC
					Salvatore Spagnolo	New York Power Authority	1	NPCC
					Shivaz Chopra	New York Power Authority	5	NPCC
OGE Energy - Oklahoma Gas and Electric Co.	Sing Tay	6	SPP RE	OKGE	Sing Tay	OGE Energy - Oklahoma	6	MRO
					Terri Pyle	OGE Energy - Oklahoma Gas and Electric Co.	1	MRO
					Donald Hargrove	OGE Energy - Oklahoma Gas and Electric Co.	3	MRO
					Patrick Wells	OGE Energy - Oklahoma Gas and Electric Co.	5	MRO

1. ***SDT has determined that additional work is necessary to ensure the retirement of certain standard requirements does not create a reliability gap. The SDT recommends that these standards requirements be considered as part of the SER Phase II effort. These requirements include: BAL-005-1, Requirements R4 and R6; COM-002-4, Requirement R2; EOP-005-3, Requirement R8; EOP-006-3, Requirement R7; IRO-014-3, Requirement R3; IRO-017-1, Requirement R3; and VAR-001-5, Requirement R3. Do you agree with the SDT's recommendation that these standards requirements be considered as part of the SER Phase II effort? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation.***

Summary Response:

The SDT received comments regarding additional retirements from the SAR. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards or requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards to Phase II for further disposition.

The SDT received several comments requesting clarification of the Phase II referrals. The Phase II Standards Efficiency Review created a subteam consisting of the team leadership from Project 2018-03 and two members of the Phase II team. This subteam will, independent of the Phase II concept teams, create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer	No
Document Name	

Comment

- BAL-005-1 R4 & R6 are now adequately covered under TOP-010-1(i) and are redundant to list under BAL-005-1

- COM-002-4 R2 should be covered in each entities Systematic Approach to Training per PER-005-2.
- EOP-005-3 R8 should be covered in each entities Systematic Approach to Training per PER-005-2.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.
A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

BAL-005-1 (R4&R6): In order to retire these requirements, TOP-010-1(i) would require modifications to expressly address quality flags addressing missing or invalid data.
COM-002-4: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address COM-002-4 R2.
EOP-005-3: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address EOP-005-3 R8.

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6

Answer	No
Document Name	

Comment	
GCPD agrees with the initial assessment that these standards should be retired for the originally-identified rationales.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition. A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements. Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	No
Document Name	
Comment	
IID determined these requirements the SDT has recommended to be considered as part of the SER Phase II effort should proceed to ballot as proposed retirements based on the original SAR and recommendations from the SER Phase I teams. This would allow the Registered Ballot Body to vote on whether these requirements are appropriate for retirement or if additional work is necessary. If the retirement of	

these requirements do not pass ballot, IID supports that they be considered as part of SER Phase II, however the SDT should ensure the SER Phase II scope clearly indicates they will address requirements. Note that the current SER Phase II scope and six efficiency concepts does not indicate they will be addressing specific requirements.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	No
Document Name	

Comment

Regarding BAL-005-1 req.4, Southern Company determined that in order for the BA operators to be able to perform their job effectively, then the BA manager must provide the adequate tools needed that are associated with Reporting ACE. To ensure that the information is correct, the BA manager must ensure that operators have accurate information and have indicators if data is either missing or

incorrect. Having the current standard only places an administrative burden on BA entities who already have the tools in place and are training their operators on Reporting ACE. Therefore, retiring this requirement would not leave a gap in reliability. In regard to BAL-005-1 req, 6, this is another requirement that poses an administrative burden on BA entities as the calculation of Reporting ACE is critical for any entity to effectively balance load/generation and support interconnection frequency. Again, this is an inherent function of BA entities and retiring this requirement would not leave a gap in reliability. In regard to COM-002-4 req. 2, Southern determined that this requirement could easily be incorporated the current PER-005 standard as it involves System Operator training. Even if the requirement was retired without including it anywhere else in the NERC standards, COM-002-4 R1 would still be enforceable and would require System Operators to follow the documented communication protocols. We don't believe that any additional work is necessary by the SDT as the retirement of this standard would not result in a reliability gap. The related compliance activities in EOP-005-3 R8 can easily be incorporated into the PER-005 standards as a part of an entity's Systematic Approach to Training. System restoration is a reliability-related task and should be included in an entity's training program for its System Operators to ensure that they are and competent to perform restoration activities. The related compliance activities in EOP-006-3 R7 can easily be incorporated into the PER-005 standards as a part of an entity's Systematic Approach to Training. System restoration is a reliability-related task and should be included in an entity's training program for its System Operators to ensure that they are and competent to perform restoration activities. In regard to IRO-014-3 req. 3, this is an inherent part of performing as a Reliability Coordinator as coordination is at the heart of this function. A standard requirement is not needed, because the RC serves an area and has responsibilities for multiple entities. Any improprieties by the RC, will surely be voiced by one or more of the member entities and therefore, a requirement is not needed, and therefore we don't believe that any additional work is necessary by the SDT before retiring this requirement. In regard to VAR-001-5 R3, Monitoring and maintaining voltage/regulating devices is an inherent responsibility of the TOP entity. It is also essential in ensuring effective operations to effectively transfer power while minimizing losses. Furthermore, it is in the TOP entity's best interest to maintain system voltage to avoid overloading the system and causing SOLs and IROLs, along with damage to transmission equipment and facilities. Since these functions are done inherently, the NERC standard only increases the administrative burden on the entities and therefore, retirement of this requirement would not create a gap in reliability.	
Likes 0	

Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

BAL-005-1 (R4&R6): In order to retire these requirements, TOP-010-1(i) would require modifications to expressly address quality flags addressing missing or invalid data.
COM-002-4: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address COM-002-4 R2.
EOP-005-3: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address EOP-005-3 R8.
EOP-006-3: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address EOP-006-3 R7
IRO-014-3: IRO-014-3, Requirement R1 time horizon would need to be revised to a time horizon of “Real-time” if Requirement R3 were to be retired. Revision of Requirement R1 is outside the scope of the project, so retirement of IRO-014-3, Requirement R3 is not being sought during this phase of the project.

VAR-001-5: The TOP-series of standards does not provide sufficient granularity to assure that adequate voltage/reactive resources, both of magnitude and type, are operated to voltage and reactive flow as necessary, Requirement R3 is not being sought during this phase of the project.

Please Note: VAR-001-4.2, is an inactive standard. VAR-001-5 changed the WECC variance, and not the continent- wide requirements. VAR-001-5 became effective January 1, 2019.

Kayleigh Wilkerson - Lincoln Electric System - 5, Group Name Lincoln Electric System	
Answer	No
Document Name	
Comment	
In consideration that the actions specified in VAR-001-5 R3 are inherent to the System Operators' core functions, LES determined R3 is still suitable for retirement as part of the SER Phase I effort. The prevention and mitigation of SOL exceedances, as dictated by applicable TOP standards, ensures System Operators utilize the necessary devices to regulate transmission voltage and reactive flow. This requirement provides no additional direction and taken independently is too vague to provide useful guidance in ensuring reliability.	
Likes 0	
Dislikes 0	
Response	
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VAR-001-5: The TOP-series of standards does not provide sufficient granularity to assure that adequate voltage/reactive resources, both of magnitude and type, are operated to voltage and reactive flow as necessary, Requirement R3 is not being sought during this phase of the project.

Please Note: VAR-001-4.2, is an inactive standard. VAR-001-5 changed the WECC variance, and not the continent- wide requirements. VAR-001-5 became effective January 1, 2019.

Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen

Answer	Yes
Document Name	

Comment

If EOP-005-3 R8 is retired, R9 and R10 should be considered at the same time with potential migration into the PER Standards.
If EOP-006-3 R7 is retired, R8 should be considered at the same time with potential migration into the PER Standards.
Please note that EOP-005-3 and EOP-006-3 are enforceable 04/01/19.
If IRO-017-1 R3 is to be retired, A new TPL-001-5 R8 should include the RC function.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the

reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition. A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements. Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration. EOP-005-3: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address EOP-005-3 R8. EOP-006-3: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address EOP-006-3 R7.

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
SRP supports the retirement of the requirements above in the SER Phase II effort.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	

Answer	Yes
Document Name	
Comment	
Reclamation agrees with the justification for retaining COM-002-4 Requirement R2 and EOP-005-3 Requirement R8.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	

LDWP agrees that IRO-017-1 should be a part of a Phase II effort. If the TPL-001-4 standard is not clarified to notify Peak RC of the transmission results then there may not be a mechanism for notifying the RC about potential IROLs.

Likes 0	
Dislikes 0	

Response

Thank you for your support. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

Quintin Lee - Eversource Energy - 1, Group Name Eversource Group

Answer	Yes
Document Name	

Comment

Although we agree with moving these Requirements into the SER Phase II effort, there is a concern that addressing these Requirements may be delayed due to the Phase II 'Concept' selection process. Currently the Phase II Concept process has a timeline that extends into September and that date is only for deciding which recommendation(s) to use.

Also, there is no assurance that the Concepts chosen in Phase II will address the deferred Requirements proposed for retirement in Phase I.

A suggestion would be for the Phase II team to address these deferred Requirements separately as they decide on which Concepts to use.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	Yes
Document Name	

Comment

None

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Westar and Kansas City Power & Light Co. support Edison Electric Institute's response to Question 1.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments from Edison Electric Institute.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	

Likes 0	
Dislikes 0	
Response	
Please see response to comments from Edison Electric Institute.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
EEI agrees that some Reliability Standards and associated requirements present more complex consideration and research in order to ensure proposed retirements do not create unintended reliability gaps. Moreover, we support the proposal to shift such requirements to the SER Phase II effort. However, the recent posting on the SER Phase II Concepts has created some confusion. EEI recommends that NERC or the SER Advisory provide additional information to help clarify the full scope of the upcoming SER Phase II Project—including these requirements for consideration for Phase II and the proposed Concepts. EEI also encourages the SDT to prioritize these requirements for Phase II so that progress is not held up by the SDT efforts to refine the proposed Concepts.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.	

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee

Answer	Yes
Document Name	

Comment

If EOP-005-3 R8 is retired, R9 and R10 should be considered at the same time with potential migration into the PER Standards.

If EOP-006-3 R7 is retired, R8 should be considered at the same time with potential migration into the PER Standards.

Please note that EOP-005-3 and EOP-006-3 are enforceable 04/01/19.

If IRO-017-1 R3 is to be retired, A new TPL-001-5 R8 should include the RC function.

Note: ERCOT has not signed on to this SRC joint response, however will provide its own response in a separate submission.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

EOP-005-3: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address EOP-005-3 R8.

EOP-006-3: PER-005-2 currently addresses a systematic approach to training, but does not expressly include the identification of a reliability-related task to address EOP-006-3 R7.

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations

Answer	Yes
Document Name	

Comment

In conducting the review, we suggest that where requirements are found to be somewhat, but not completely duplicative, consider proceeding with the retirement of the identified requirements and adding any language of the retired requirement that is still pertinent to the requirements which will still be in effect.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications

would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition. A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements. Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
It appears from the technical rational document that the 2018-03 drafting team determined the Requirements should be revised and retained rather than retired in their entirety. Since standard revision is within the scope of the Phase 2 team, AEP has no objections to the concept of revising COM-002-4 R2, EOP-005-3 R8, IRO-017-1 R3, and VAR-001-5 R3.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - sou, Group Name RSC no Dominion, Con-Edison	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Scanlon - Exelon - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

2. The SDT is proposing to take no action on two standards already scheduled for retirement: PRC-015-1, Requirements R1, R2 and R3; and PRC-018-1, Requirements, R1, R2, R3, R4, R5 and R6. Do you agree with the SDT's recommendation to take no action for these standards already scheduled for retirement? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation.

Summary Response:

The SDT received comments regarding the retaining of PRC-015-1 and PRC-018-1. The SDT determined that revisions are needed within the PRC-002-2 Implementation Plan in order to pursue immediate retirement of this standard. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for <u>unconditional retirement</u>. Therefore, the SDT referred these standards to Phase II for further disposition.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	
PRC-018-1 references Regional Criteria that must be followed to comply with the standard. Duke Energy requests the drafting team consider the ramifications on PRC-018-1 if a Region has already retired its Regional Criteria applicable to PRC-018 and PRC-002. The absence of any applicable Regional Criteria for a particular Region, makes PRC-018-1 a stronger candidate for immediate retirement.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any	

modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition. A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements. Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	No
Document Name	
Comment	
GCPD agrees with the initial assessment that these standards should be retired for the originally-identified rationales.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.	

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Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	No
Document Name	
Comment	

OKGE disagrees with the SDT's proposal of taking no action on PRC-018-1. Per the PRC-002-2 Implementation Plan,

"Each Transmission Owner, and Generator Owner shall maintain documentation to demonstrate compliance with PRC-018-1 until that entity meets the requirements of PRC-002-2 in accordance with this Implementation Plan. Standard PRC-018-1 shall remain effective throughout the phased implementation period of PRC-002-2 and shall be applicable to an entity's Disturbance monitoring and reporting activities not yet transitioned to PRC-002-2. PRC-018-1 will be retired following full implementation of PRC-002-2 as noted below."

OKGE determined this justification is flawed. The requirements in PRC-018-1 states that TOs and GOs are required to install DMEs per the requirements established by its Regional Reliability Organization (RRO). However, in the SPP region, since PRC-002-1 was never approved by FERC and with the creation of PRC-002-2, the requirements that were established by SPP on DMEs were removed from SPP Planning Criteria in April 2017. Currently, the SPP RTO has no DME installation requirements, therefore, the entities in the SPP region do not have a set of criteria to follow to meet the requirements in PRC-018-1 (particularly for requirements R4 and R5, where DME equipment required by the RRO is not specified). OKGE determined PRC-018-1 should be retired prior to PRC-002-2's full implementation (i.e 7/1/2022).

Likes 0	
Dislikes 0	
Response	

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition. A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements. Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
LDWP agrees with the retirement of PRC-015-1 requirements R1, R2, and R3 since they will be superseded by PRC-012.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	

Dislikes 0	
Response	
Please see response to comments from ISO/RTO Council Standards Review Committee.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Reclamation agrees that PRC-015-1 and PRC-018-1 should continue on their present scheduled paths toward being retired/superseded.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

3. *The SDT determined the following requirements are inappropriate for retirement because they serve a reliability benefit: IRO-002-5, Requirements R4 and R6; IRO-008-2, Requirement R6, and TOP-001-4, Requirements R16 and R17. Do you agree with the SDT's recommendation to retain these requirements? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's recommendation, please provide your explanation*.

Summary Response:

The SDT received several comments on retaining the requirements in IRO-002-5 (R4 and R6), IRO-008-2 (R6), and TOP-001-4 (R16 and R17). The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards or requirements. Therefore, the SDT referred these standards to Phase II for further disposition.

IRO-002-5, Requirements R4 and R6 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES; therefore, retirement of these requirements is not being sought during this phase of the project.

Requirement R4 of IRO-002-5 needs to be retained to make it clear that the System Operator has authority to postpone, cancel or recall planned outages of Energy Management System (EMS), Internet Technology (IT), or communications-related equipment. Although some RCs may include this type of equipment in their outage coordination process (cf. IRO-017-1), the inclusion of EMS, IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1. In addition, RC equipment outages are not required to follow the RC's outage coordination process (i.e., IRO-017-1, Requirement R2 is only applicable to TOPs and BAs). As such, a potential gap in the standards would exist if IRO-002-5, Requirement R4 was retired.

Although IRO-008-2, Requirement R6 appears to be administrative in nature, there are reliability benefits to knowing what actions were taken to prevent or mitigate the exceedance. Therefore, retirement of IRO-008-2, Requirement R6 is not being sought during this phase of the project.

The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for

unconditional retirement; i.e. these requirements may be retired without any modifications to other standards or requirements. Therefore, the SDT referred these standards to Phase II for further disposition.
The SDT believes Requirements R16 and R17 should be retained for the following reasons:

Requirements R16 and R17 of TOP-001-4 need to be retained to make it clear that the System Operator has authority to postpone, cancel or recall planned outages of EMS, IT or communications-related equipment. Although some RCs may include this type of equipment in their outage coordination process (IRO-017-1), the inclusion of EMS, IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1. As such, a potential gap in the standards would exist if TOP-001-4, Requirements R16 and R17 were retired. Requirements R16 and R17 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES. Therefore, retirement of TOP-001-4, Requirements R16 and R17 is not being sought during this phase of the project.

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC

Answer	No
Document Name	

Comment

TOP-001-4 R16 and R17 do not provide a reliability benefit. They don't even align with most, if not all, standard business processes. The Outage Coordinator, SCADA EMS, IT Networking, and Communications departments determine the impacts of all "Planned" outages or telemetry equipment. Most System Operators do not even have the technical knowledge to make substantiated decision to delay or postpone this work. Our System Operators may approve "Unplanned" outages but this is a rare exception and is not in scope for these requirements. Other requirements, such as R13 are already in place which demand an extremely high availability of EMS functionality, EMS & IT staff are well aware that unplanned outages impacting the ability to view and solve contingency analysis are unacceptable for anything other than a brief interruption.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

The SDT determined Requirements R16 and R17 should be retained for the following reasons:

Requirements R16 and R17 of TOP-001-4 need to be retained to make it clear that the System Operator has authority to postpone, cancel or recall planned outages of EMS, IT or communications-related equipment. Although some RCs may include this type of equipment in their outage coordination process (IRO-017-1), the inclusion of EMS, IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1. As such, a potential gap in the standards would exist if TOP-001-4, Requirements R16 and R17 were retired. Requirements R16 and R17 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES. Therefore, retirement of TOP-001-4, Requirements R16 and R17 is not being sought during this phase of the project.

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
SRP determined the requirements above can be retired without substantive reliability impact consistent with the justifications provided in the SER SAR.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition. A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements. Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	No
Document Name	
Comment	
AZPS shares the opinion of many others in the industry that the language in requirements TOP-001-4 R16 and R17 does not, in and of themselves, provide any reliability benefit. Simply having “the authority to approve outages and maintenance” does not assure that an approval occurs, nor is it required to be compliant. Since a simple letter or procedure stating that operators have the stated authority is adequate to demonstrate compliance, this action does not provide a reliability benefit.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

The SDT determined Requirements R16 and R17 should be retained for the following reasons:

Requirements R16 and R17 of TOP-001-4 need to be retained to make it clear that the System Operator has authority to postpone, cancel or recall planned outages of EMS, IT or communications-related equipment. Although some RCs may include this type of equipment in their outage coordination process (IRO-017-1), the inclusion of EMS, IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1. As such, a potential gap in the standards would exist if TOP-001-4, Requirements R16 and R17 were retired. Requirements R16 and R17 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES. Therefore, retirement of TOP-001-4, Requirements R16 and R17 is not being sought during this phase of the project.

LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	No
Document Name	
Comment	
GCPD agrees with the initial assessment that these standards should be retired for the originally-identified rationales.	
Likes 0	

Dislikes 0	
Response	

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer	No
Document Name	
Comment	

Duke Energy recommends the drafting team consider IRO-008-2 R6 for immediate retirement. We agree with the drafting team's assertion in the Technical Justifications document that characterizes R6 as administrative in nature. We do not believe that there is much if any reliability benefit in requiring an RC to notify the TOPs or BAs of any SOL/IROL exceedance that was prevented or already mitigated. There is already an Operating Plan in place to be followed for such an event, and alerting Operators of an issue that they are already aware of, and potentially distracting them from dealing with other Real-time issues, is of minimal reliability benefit.

Likes 0	
Dislikes 0	
Response	

Thank you for your comments.

The SDT determined that this requirement should be retained for the following reasons:

Although IRO-008-2, Requirement R6 appears to be administrative in nature, there are reliability benefits to knowing what actions were taken to prevent or mitigate the exceedance. Therefore, retirement of IRO-008-2, Requirement R6 is not being sought during this phase of the project.

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	No
Document Name	
Comment	
CenterPoint Energy Houston Electric, LLC does not believe that TOP-001-4, Requirements R16 and R17 to “provide its System Operators with the authority to approve outages and maintenance of its telemetering and control equipment…” themselves provide a reliability benefit. Furthermore, we believe that this “authority” is inherent in “acting to maintain the reliability of its TOP/BA Area via its own actions or by issuing Operating Instructions” as is required by TOP-001-4, Requirement R1 and R2, and as such, R16 and R17 are not needed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.	

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.

The SDT determined Requirements R16 and R17 should be retained for the following reasons:

Requirements R16 and R17 of TOP-001-4 need to be retained to make it clear that the System Operator has authority to postpone, cancel or recall planned outages of EMS, IT or communications-related equipment. Although some RCs may include this type of equipment in their outage coordination process (IRO-017-1), the inclusion of EMS, IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1. As such, a potential gap in the standards would exist if TOP-001-4, Requirements R16 and R17 were retired. Requirements R16 and R17 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES. Therefore, retirement of TOP-001-4, Requirements R16 and R17 is not being sought during this phase of the project.

Jesus Sammy Alcaraz - Imperial Irrigation District - 1

Answer	No
Document Name	

Comment

IID determined these requirements the SDT has identified as inappropriate for retirement should proceed to ballot as proposed retirements based on the original SAR and recommendations from the SER Phase I teams. This would allow the Registered Ballot Body to vote on whether these requirements are appropriate for retirement or if additional work is necessary. If the retirement of these requirements do not pass ballot, IID supports that they be considered as part of SER Phase II, however the SDT should ensure the SER Phase II scope clearly indicates they will address requirements. Note that the current SER Phase II scope and six efficiency concepts does not indicate they will be addressing specific requirements.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition. A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements. Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
In regard to IRO-002-5 R4, it should be retired as approving planned outages is a reliability related task and can be easily incorporated into the current PER-005 standard. Although the requirement has a benefit to reliability, it should fall within the Operator Training standards. Therefore, the retirement of this standard requirement would be appropriate. In regard to IRO-002-5 R6, this requirement administrative in nature and duplicative and should be retired based on the following reason/s: Before an entity is allowed to function as a Reliability Coordinator, it goes through a certification process, which ensures that the entity has all the relative systems in place to perform system monitoring and assessments. In addition, the certification review also involves determining if the entity's data/voice communication systems have redundancy, the ability to effectively transfer data and has alarms built in to notify System Operators in the event of adverse changes to the system.	

Furthermore, the RC function is on a 3-year audit schedule by the RRO and therefore, the RC will have to continuously show that it has these same capabilities.

In regard to IRO-008-2, R6, we see no reliability benefit in this requirement as both the RC and the impacted entities will already have sufficient monitoring systems in place to ensure that all are aware when a potential SOL/IROL has been prevented/mitigated. The specific actions that the RC took to prevent/mitigate the exceedance only benefits reliability from a possible teaching point to System Operators, who may experience the same type of event in the future.

However, from an operational reliability standpoint, there is no benefit to the RC notifying entities of the actions taken to prevent/mitigate and exceedance and takes the RC's attention away from performing its responsibility to continuously monitor and assess the system.

We believe that TOP -001-4 R16 and R17 should be retired as the authority to approve planned outages is a reliability related task that can easily be incorporated into the current PER-005 standard. Although the requirements do benefit reliability, they should fall within the Operator Training standards. Therefore, the retirement of these requirements would be appropriate.

Likes 0	
Dislikes 0	

Response

The SDT determined that IRO-002-5 Requirements R4 and R6 should be retained for the following reasons:

IRO-002-5, Requirements R4 and R6 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES; therefore, retirement of these requirements is not being sought during this phase of the project.

Requirement R4 of IRO-002-5 needs to be retained to make it clear that the System Operator has authority to postpone, cancel or recall planned outages of Energy Management System (EMS), Internet Technology (IT), or communications-related equipment. Although some RCs may include this type of equipment in their outage coordination process (cf. IRO-017-1), the inclusion of EMS, IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1. In addition, RC equipment outages are not required to follow the RC's outage coordination process (i.e., IRO-017-1, Requirement R2 is only applicable to TOPs and BAs). As such, a potential gap in the standards would exist if IRO-002-5, Requirement R4 was retired.

Although IRO-008-2, Requirement R6 appears to be administrative in nature, there are reliability benefits to knowing what actions were taken to prevent or mitigate the exceedance. Therefore, retirement of IRO-008-2, Requirement R6 is not being sought during this phase of the project.

Thank you for your comments. The SDT determined that additional work (and technical rationale) is needed within standards/requirements prior to retirements on these standards/requirements. The SDT used a risk-based approach to evaluate the reliability benefit of each requirement in the SAR for unconditional retirement; i.e. these requirements may be retired without any modifications to other standards/requirements. For each of the standards addressed herein, the SDT determined that modifications would be necessary to other standards/requirements to maintain reliability. Therefore, the SDT referred these standards/requirements to the SER Phase II effort for further disposition.

A subteam was created consisting of the team leadership from Project 2018-03 Standards Efficiency Review Retirements, and two members of the SER Phase II effort team. This subteam will be independent of the SER Phase II effort concept teams, and will create a SAR to address the standards/requirements they are recommending to move forward for revisions and retirements.

Any comments applicable to the SER Phase II effort, will be referred to the SER Phase II effort subteam for consideration.
The SDT determined Requirements R16 and R17 should be retained for the following reasons:

Requirements R16 and R17 of TOP-001-4 need to be retained to make it clear that the System Operator has authority to postpone, cancel or recall planned outages of EMS, IT or communications-related equipment. Although some RCs may include this type of equipment in their outage coordination process (IRO-017-1), the inclusion of EMS, IT or communications-related equipment is not explicitly required by IRO-017-1, Requirement R1. As such, a potential gap in the standards would exist if TOP-001-4, Requirements R16 and R17 were retired. Requirements R16 and R17 are necessary for the Real-time operators to be assured of having the tools necessary to monitor the BES. Therefore, retirement of TOP-001-4, Requirements R16 and R17 is not being sought during this phase of the project.

Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	

ISO-NE recommends to review the retirements of these requirements as part of Phase 2	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
LDWP agrees with the SDT's recommendation.	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	

Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
IRO-002-5 and IRO-008-2 were not reviewed as we are not a RC and therefore the standards are not applicable. Minnesota Power agrees with NSRF's recommendation for TOP-001-4.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Please see response to NSRF comments.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
SRC recommends that the retirement of these requirements be reviewed as part of Phase 2. Note: ERCOT has not signed on to this SRC joint response, however will provide its own response in a separate submission.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency,	

6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

4. *The SDT is proposing to retire FAC-008-3, Requirements R7 and R8. Do you agree with the SDT's proposal to retire these requirements? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.

Summary Response:

The SDT received comments regarding the proposed retirement of FAC-008-3 (R7 and R8).

The SDT determined that these requirements should be retired for the following reasons:

These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. In MOD-032-1, Requirement R1, the Planning Coordinator (PC) and Transmission Planners (TP) develop modeling data requirements and reporting according to Attachment 1. In MOD-032-1 R2, the Transmission Operator (TO) and Generator Operator (GO) provide power capabilities data in Item 3, and facility ratings data in Items 3(f), 4(c) and 6(g) in the steady-state column of Attachment 1, as requested by the TP or PC.

IRO-010-2, Requirement R1 and TOP-003-3, Requirement R1 require the Reliability Coordinator (RC) and the Transmission Operator (TOP) to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments. This data necessarily includes facility ratings as inputs to SOL monitoring. IRO-010-2, Requirement R3 and TOP-003-3, Requirement R5 require that the TO and the GO to respond to the RC's and the TOP's requests.

The identity and rating of the next most limiting equipment is not of value in the Operations Planning Time Horizon relating to these requirements because the elimination of the most limiting equipment cannot occur in the Operations Planning Time Horizon.

Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	No
Document Name	
Comment	

Additional consideration is needed regarding the Facility Ratings requirements and the relationship to the data requirements of MOD-032, IRO-010, and TOP-003-3 and should be a separate project.

Note: ERCOT has not signed on to this SRC joint response, however will provide its own response in a separate submission.

Likes 0	
Dislikes 0	

Response

Thank you for your comment. The SDT determined that these requirements should be retired for the following reasons:

These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. In MOD-032-1, Requirement R1, the Planning Coordinator (PC) and Transmission Planners (TP) develop modeling data requirements and reporting according to Attachment 1. In MOD-032-1 R2, the Transmission Operator (TO) and Generator Operator (GO) provide power capabilities data in Item 3, and facility ratings data in Items 3(f), 4(c) and 6(g) in the steady-state column of Attachment 1, as requested by the TP or PC.

IRO-010-2, Requirement R1 and TOP-003-3, Requirement R1 require the Reliability Coordinator (RC) and the Transmission Operator (TOP) to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments. This data necessarily includes facility ratings as inputs to SOL monitoring. IRO-010-2, Requirement R3 and TOP-003-3, Requirement R5 require that the TO and the GO to respond to the RC's and the TOP's requests.

Rachel Coyne - Texas Reliability Entity, Inc. - 10

Answer	No
Document Name	

Comment

Due to the importance of the use of accurate Facility Ratings in reliable BES operations and planning, Texas RE recommends FAC-008-3 R7 and R8 remain effective in order to emphasize the need to provide accurate Facility Ratings to entities that require Facility Rating data. These Requirements place an emphasis on the provision of accurate Facility Ratings to the entities responsible for the operation and planning of the BES. Although IRO-010 and MOD-032 data specifications will likely address the provision of Facility Ratings to the

these entities, the large quantity of additional data potentially included within the data specifications can lead to a reduced emphasis on the Facility Rating component of the data specification. FAC-008-3 R7 and R8 would focus an entity on a specific facet of data and data exchange. Moreover, FERC Order 693 Paragraph 771 directed NERC to develop modifications to FAC-008-1 to "for each facility, identify the limiting component and, for critical facilities, the resulting increase in rating of that component is no longer limiting". Requirement R8 meets this directive by requiring "Identity of the existing next most limiting equipment of the Facility (R8.1) and "The Thermal Rating for the next most limiting equipment (R8.2).	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT determined that these requirements should be retired for the following reasons: These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. In MOD-032-1, Requirement R1, the Planning Coordinator (PC) and Transmission Planners (TP) develop modeling data requirements and reporting according to Attachment 1. In MOD-032-1 R2, the Transmission Operator (TO) and Generator Operator (GO) provide power capabilities data in Item 3, and facility ratings data in Items 3(f), 4(c) and 6(g) in the steady-state column of Attachment 1, as requested by the TP or PC. IRO-010-2, Requirement R1 and TOP-003-3, Requirement R1 require the Reliability Coordinator (RC) and the Transmission Operator (TOP) to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments. This data necessarily includes facility ratings as inputs to SOL monitoring. IRO-010-2, Requirement R3 and TOP-003-3, Requirement R5 require that the TO and the GO to respond to the RC's and the TOP's requests. The identity and rating of the next most limiting equipment is not of value in the Operations Planning Time Horizon relating to these requirements because the elimination of the most limiting equipment cannot occur in the Operations Planning Time Horizon.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	

Comment	
OPG agrees with RSC position.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments made by RSC.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	No
Document Name	
Comment	
We recommend a separate standards development project be initiated to holistically address issues identified during the periodic review of FAC-008-3 and the potential retirement of FAC-008-3 requirements identified during the Standards Efficiency Review. On March 18, 2010, Docket No. RR09-6-000, FERC issued an order directing NERC to propose modification of electric reliability organization rules of procedure. This order included FERC's concerns regarding facility ratings and limiting elements. (Please see paragraph 13 and 14 of the FERC order.) We believe that additional consideration is needed regarding the Facility Ratings requirements and the relationship to the data requirements of MOD-032, IRO-010, and TOP-003 to ensure that most limiting elements are determined. The equipment data that is required to be provided per the other reliability standards may not be sufficient to determine Facility Ratings, including for use in Real Time Models.	
Likes 1	Ontario Power Generation Inc., 5, Chitescu Constantin
Dislikes 0	
Response	
Thank you for your comment. The SDT determined that these requirements should be retired for the following reasons:	

These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. In MOD-032-1, Requirement R1, the Planning Coordinator (PC) and Transmission Planners (TP) develop modeling data requirements and reporting according to Attachment 1. In MOD-032-1 R2, the Transmission Operator (TO) and Generator Operator (GO) provide power capabilities data in Item 3, and facility ratings data in Items 3(f), 4(c) and 6(g) in the steady-state column of Attachment 1, as requested by the TP or PC.

IRO-010-2, Requirement R1 and TOP-003-3, Requirement R1 require the Reliability Coordinator (RC) and the Transmission Operator (TOP) to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments. This data necessarily includes facility ratings as inputs to SOL monitoring. IRO-010-2, Requirement R3 and TOP-003-3, Requirement R5 require that the TO and the GO to respond to the RC's and the TOP's requests.

The identity and rating of the next most limiting equipment is not of value in the Operations Planning Time Horizon relating to these requirements because the elimination of the most limiting equipment cannot occur in the Operations Planning Time Horizon.

Richard Vine - California ISO - 2	
Answer	No
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to comments from ISO/RTO.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	No
Document Name	
Comment	

Additional consideration is needed regarding the Facility Ratings requirements and the relationship to the data requirements of MOD-032, IRO-010, and TOP-003-3 and should be a separate project	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT determined that these requirements should be retired for the following reasons: These requirements are duplicative of the data provision standards MOD-032-1, IRO-010-2, and TOP-003-3. In MOD-032-1, Requirement R1, the Planning Coordinator (PC) and Transmission Planners (TP) develop modeling data requirements and reporting according to Attachment 1. In MOD-032-1 R2, the Transmission Operator (TO) and Generator Operator (GO) provide power capabilities data in Item 3, and facility ratings data in Items 3(f), 4(c) and 6(g) in the steady-state column of Attachment 1, as requested by the TP or PC. IRO-010-2, Requirement R1 and TOP-003-3, Requirement R1 require the Reliability Coordinator (RC) and the Transmission Operator (TOP) to list necessary data and information needed to perform its Operating Planning Analyses and Real-Time Assessments. This data necessarily includes facility ratings as inputs to SOL monitoring. IRO-010-2, Requirement R3 and TOP-003-3, Requirement R5 require that the TO and the GO to respond to the RC's and the TOP's requests.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
The redline version of FAC-008-3 provided by the SDT does not appear to be the same as the version posted on the NERC website under 'Mandatory Standards Subject to Enforcement'. However, the wording of the Requirements proposed for retirement is the same.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. The SDT updated the template for this standard during development.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	

Answer	Yes
Document Name	
Comment	

While we do not oppose the retirement of R7 and R8, we note that some aspects of R8 were added to address a FERC directive in Order 693. The Commission was so intent on this directive that it ordered NERC to modify its Rules of Procedure in a March 18, 2010 Order (Docket No. RR09-6-000) to better accommodate FERC directives in the Standards development process. FERC denied a NERC request for a stay on making further modifications to FAC-008 in September 2010. This ultimately led to development of FAC-008-3 and the addition of R8 under Project 2009-06. FERC approved FAC-008-3 in an order issued on November 17, 2011 (Docket No. RD11-10). The drafting team should consider whether the standards referenced in the technical rationale supporting retirement of R7 and R8 (MOD-032-1, IRO-010-2, and TOP-003-3) adequately address R8, part 8.2.

Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The identity and rating of the next most limiting equipment is not of value in the Operations Planning Time Horizon relating to these requirements because the elimination of the most limiting equipment cannot occur in the Operations Planning Time Horizon.

Wendy Center - U.S. Bureau of Reclamation - 5

Answer	Yes
Document Name	
Comment	

Reclamation supports the retirement of FAC-008-3 Requirements R7 and R8.

Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	
Document Name	
Comment	
Not applicable to the IESO	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

5. *The SDT is proposing to retire FAC-013-2, Requirements R1, R2, R4, R5 and R6 (all). Do you agree with the SDT's proposal to retire FAC-013-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.

Summary Response:

The SDT received comments regarding the proposed retirement of FAC-013-2. Although assessing transfer capability in the planning horizon is a method to test the robustness of the system, robustness testing of a system is not an indicator of reliability because there is no metric for robustness. Additionally, the proposed retirement of FAC-013-2 does not preclude any entity from performing studies to assess transfer capability for their own purposes. The reliability benefit of doing such an assessment varies from entity to entity, with some entities not having a benefit for the assessment it at all. The 2013 NERC Independent Experts Review Project (IERP) identified Requirements R2 and R3 as administrative and recommended them for retirement. Requirement R3 was approved for retirement by FERC in 2014.

TPL-001-5 R1.1.4 takes in to consideration Firm Transmission Service and Interchange and R2.1.3 uses expected transfers. Both FAC-013-2 and TPL-001-5 are for the Near-Term Transmission Planning Horizon. This along with a combination of existing TPL, MOD, and FAC Standards ensures the BES is operated reliably by determining the modelling exists to identify any SOL/IROL(s) and the TOP standards ensure entities prevent or mitigate for any SOL/IROL(s). The purpose is to ensure Bulk Electric System operates reliably over a broad spectrum of system conditions and following a wide range of probable contingencies.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	
Duke Energy would like to reiterate its opposition to the retirement of FAC-013-2.	

An explanation addressing how FERC's concerns in Orders 693 and 729 are still addressed needs to be provided. As stated in introduction with the Whitepaper published with the standard in Project 2010-10:

"Through FERC Orders 693 (paragraphs 782 and 794) and 729 (paragraphs 278, 279, 289, 290 and 291), FERC directed NERC to establish a standard requiring Planning Coordinators to calculate transfer capability in the planning horizon and communicate the results. In the FERC Order approving the MOD standards related to ATC/AFC calculations (MOD-001, MOD-028, MOD-029, and MOD-030), FERC did not approve NERC's request to withdraw FAC-012-1, nor did they approve the retirement of FAC-013-1. With respect to these two Reliability Standards, the Commission disagreed with NERC that they are wholly superseded by the MOD Reliability Standards.

• The Commission noted that, under FAC-012-1, Reliability Coordinators and Planning Authorities would be required to document the methodology used to establish interregional and intra-regional transfer capabilities and to state whether the methodology is applicable to the planning horizon or the operating horizon.

• The Commission also noted that, under FAC-013-1, Reliability Coordinators and Planning Authorities are required to establish a set of inter-regional and intra-regional transfer capabilities that are consistent with the methodology documented under FAC-012-1, which could require the calculation of transfer capabilities for both the planning horizon and the operating horizon.

• The Commission posited that these FAC Reliability Standards were necessary because the proposed MOD Reliability Standards provide only for the calculation of available transfer capability and its components, including total transfer capability, in the operating horizon. Thus, the Commission stated, the proposed MOD Reliability Standards do not govern the calculation of transfer capabilities in the planning horizon, i.e., beyond 13 months in the future.

• The Commission also noted, that the calculation of transfer capabilities in the planning horizon (years one through five) may not be so accurate to support long-term scheduling of the transmission system but that such forecasts 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 Commission stated that the responsibility for calculation of transfer capabilities in the planning horizon would be appropriately assigned to the Planning Coordinator and not the Reliability Coordinator.

Consistent with the above philosophy and to address FERC's concerns, FAC-013-2 requires that Planning Coordinators have a current documented methodology for use in performing an annual assessment of Transfer Capability in the Near-Term Planning Horizon (Transfer Capability Methodology)."

In the Technical Justification document, the SDT states that:

"The requirement for Planning Coordinators (PC) to have a methodology for and to perform an annual assessment of Transfer Capability for a single year in the Near-Term Transmission Planning Horizon does not benefit System reliability beyond that provided by other Reliability Standards."

Assuming that the drafting team is referencing TPL-001 in the above statement, we would like to point out that TPL-001 standard does not REQUIRE that transfer sensitivities be performed and are not likely to indicate limitations to transfer from neighboring systems which is indicative of a neighbor's ability to support a system during an energy emergency. In its response to comments the SDT agreed that at some point in the future it would be appropriate to move the requirements of FAC-013-2 into the TPL standards. This was not possible at the time due to the timing requirements necessary to meet FERC's orders. In addition the SDT's Whitepaper stated:

"The TPL standards define the studies to be performed, the performance requirements for the BES and the details of the required assessments. FAC-013-2 is intended to identify potential future weaknesses in the system by performance of tests - application of bulk energy transfers to stress the system. FAC-013-2 adds to the understanding of system performance obtained through application of the TPL standards, providing knowledge of potential facilities requiring additional focus and analysis."

The Technical Justification document also states that:

"This Reliability Standard is primarily administrative in nature and does not require specific performance metrics or coordination among functional entities."

We disagree with the coordination reference in the above statement. Coordination occurs through sharing of identified limits to transfer through R2 for awareness and any necessary action.

Next, the Technical Justification document states that:

"Assessing transfer capability above the "known commitments for Firm Transmission Service and Interchange" required by TPL-001-4 (R1.1.5), serves a market function as opposed to securing System reliability."

We disagree with the statement that this is solely related to a market function. Transfers serve to stress test the system in ways that the PC deems best to identify weak points on their system and impacts on their neighbors. The Whitepaper published with the

standard stated, "In addition, this information is not intended in any way to be associated with the granting or denial of transmission service." *"Entities that receive the methodology or assessment results are not obligated to use or even consider the information in their assessments."* **While it is true that there is no obligation to use or consider the information in the assessment, as is the case with TPL-001, but the results are required to be shared with neighboring systems. The Whitepaper states "The application of FAC-013-2 will provide an assessment of the robustness of the future transmission system and facilitate communication between adjacent Planning Coordinators. FAC-013-2 addresses FERC's concerns regarding transfer capability in the planning horizon and provides important information that Planning Coordinators will be able to apply in their efforts to reliably plan the BES."** *"Requirement R4 only requires the assessment to be performed for one year in the Near-Term Transmission Planning Horizon. This year can be arbitrarily chosen by the PC and the analysis does not guarantee transmission service that is necessary for System reliability."* **The standard is supposed to provide a stress test as best determined by the PC's operating experience and knowledge to identify future system weaknesses. The Whitepaper states "AC-013-2 allows the Planning Coordinator to develop its Transfer Capability Methodology based on knowledge of its system's sensitivity to transfers and significance of Facilities to reliability, within the framework provided by FAC-013-2." It is not intended to provide information regarding transmission service which is studied in a completely different way.** *"Assessing transfer capability in the planning horizon is a method to test the robustness of the system. Robustness testing of a system is not an indicator of reliability because there is no metric for robustness."* **While there may not be a standard metric for robustness, assessing transfer capability in the planning horizon does add to the PC's portfolio of knowledge of their system's behavior under stressed conditions.**

Likes 0	
Dislikes 0	
Response	

Thank you for your comment. Although assessing transfer capability in the planning horizon is a method to test the robustness of the system, robustness testing of a system is not an indicator of reliability because there is no metric for robustness. Additionally, the proposed retirement of FAC-013-2 does not preclude any entity from performing studies to assess transfer capability for their own purposes. The reliability benefit of doing such an assessment varies from entity to entity, with some entities not having a benefit for the assessment it at all. The 2013 NERC Independent Experts Review Project (IERP) identified Requirements R2 and R3 as administrative and recommended them for retirement. Requirement R3 was approved for retirement by FERC in 2014.

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC) The California ISO has the following additional comment:	

"If FAC-013-2 is retired, then FAC-015 development under Project 2015-09 needs to be revisited, as those activities were premised on FAC-013 continuing to be in effect and modified to FAC-013-3 as part of the comprehensive changes within Project 2015-09."	
Likes 0	
Dislikes 0	
Response	
Please see response to comments from ISO/RTO Council Standards Review Committee. The SDT will communicate with the Project 2015-09 Establish and Communicate System Operating Limits NERC staff to determine if any action needs to be taken in response to your comments.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
LDWP determined FAC-013-2 needs further refinement and standardized metrics so that all Planning Coordinators are following a standard methodology.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT will communicate with the Project 2015-09 Establish and Communicate System Operating Limits NERC staff to determine if any action needs to be taken in response to your comments.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	

Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
It is important to coordinate the retirement of FAC-013-2 with the retirement of FAC-014-2 under NERC Project 2015-09 Establish and Communicate System Operating Limits. The planning level SOLs required under R3, and R4 of FAC-014-2 are usually established based on the FAC-013-2 Transfer Capability Assesment.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT will communicate with the Project 2015-09 Establish and Communicate System Operating Limits NERC staff to determine if any action needs to be taken in response to your comments.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes

Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	
Document Name	
Comment	
N/A	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
FAC-013-2 was not reviewed as we are not a PC.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	

Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

6. *The SDT is proposing to retire INT-004-3.1, Requirements R1, R2, and R3 (all). Do you agree with the SDT's proposal to retire INT-004-3.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.

Summary Response:

The SDT received comments regarding the proposed retirement of INT-004-3.1. The proposed retirement of INT-004 is due to the fact that Requirements R1 and R2 have not been enforceable for four years now since the Purchasing Selling Entity was deregistered. Those requirements are already largely moved into NAESB and the remaining parts of them are proposed to be moved to NAESB. Since there has been no reliability impact of those requirements not being enforceable for four years, there is no evidence they should be reinstated applicable to a different functional entity. Requirement 3 of INT-004 only requires the registration of data in the NAESB registry for the purpose " to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie." There is now an extensive NERC Pseudo-Tie Coordination Guideline. One of the primary guiding principles of periodic review teams is to determine if requirements are duplicative and whether they have a significant impact on reliability. Since R3 only serves to register Pseudo-Ties in a registry and their coordination is well-documented, it was unanimous there was no reliability benefit to retaining R3.

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	No
Document Name	
Comment	
BPA determined the retirement of the INT-004 requirements should be contingent upon the FERC adoption of the corresponding NAESB standards. NAESB standards do not apply equally to industry participants (e.g., not applicable to non-jurisdictional entities).	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The proposed retirement of INT-004 is due to the fact that Requirements R1 and R2 have not been enforceable for four years now since the Purchasing Selling Entity was deregistered. Those requirements are already largely moved into NAESB and the remaining parts of them are proposed to be moved to NAESB. Since there has been no reliability impact of those requirements not being enforceable for four years, there is no evidence they should be reinstated applicable to a different functional entity. Requirement 3 of INT-004 only requires the registration of data in the NAESB registry for the purpose " to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie." There is now an extensive NERC Pseudo-Tie Coordination Guideline. One of the primary guiding principles of periodic review teams is to determine if requirements are duplicative and whether they have a significant impact on reliability. Since R3 only serves to register Pseudo-Ties in a registry and their coordination is well-documented, it was unanimous there was no reliability benefit to retaining R3.

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer	No
Document Name	

Comment

INT-004-3.1 should not be retired until NAESB BPS WEQ-004 version 3.1, 3.2 is approved by FERC concerning Dynamic and Pseudo-Ties schedules.

Likes 0	
Dislikes 0	

Response

Thank you for your comment. The proposed retirement of INT-004 is due to the fact that Requirements R1 and R2 have not been enforceable for four years now since the Purchasing Selling Entity was deregistered. Those requirements are already largely moved into NAESB and the remaining parts of them are proposed to be moved to NAESB. Since there has been no reliability impact of those requirements not being enforceable for four years, there is no evidence they should be reinstated applicable to a different functional entity. Requirement 3 of INT-004 only requires the registration of data in the NAESB registry for the purpose " to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie." There is now an extensive NERC Pseudo-Tie Coordination Guideline. One of the primary guiding principles of periodic review teams is to determine if requirements are duplicative

and whether they have a significant impact on reliability. Since R3 only serves to register Pseudo-Ties in a registry and their coordination is well-documented, it was unanimous there was no reliability benefit to retaining R3.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	
Duke Energy disagrees with the proposed retirement of INT-004-3.1. In the Technical Justification document, the drafting team categorizes INT-004-3.1 as more of an impact on transmission costs, rather than reliability. While costs and pricing do not directly impact the reliability aspects of the grid, ensuring levels of transfer and practicing congestion management help to ensure reliability of the grid.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The proposed retirement of INT-004 is due to the fact that Requirements R1 and R2 have not been enforceable for four years now since the Purchasing Selling Entity was deregistered. Those requirements are already largely moved into NAESB and the remaining parts of them are proposed to be moved to NAESB. Since there has been no reliability impact of those requirements not being enforceable for four years, there is no evidence they should be reinstated applicable to a different functional entity. Requirement 3 of INT-004 only requires the registration of data in the NAESB registry for the purpose " to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie." There is now an extensive NERC Pseudo-Tie Coordination Guideline. One of the primary guiding principles of periodic review teams is to determine if requirements are duplicative and whether they have a significant impact on reliability. Since R3 only serves to register Pseudo-Ties in a registry and their coordination is well-documented, it was unanimous there was no reliability benefit to retaining R3.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	

Comment	
ACES recommends that the retirement of R3 be contingent upon the implementation of a new NAESB WEQ-004 requirement which necessitates the coordination of Pseudo-ties between impacted entities prior to implementation. This coordination is important for accurate accounting of interchange and ensuring that any related congestion can be properly managed. Without this coordination, the reliability of the system could be impacted.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The proposed retirement of INT-004 is due to the fact that Requirements R1 and R2 have not been enforceable for four years now since the Purchasing Selling Entity was deregistered. Those requirements are already largely moved into NAESB and the remaining parts of them are proposed to be moved to NAESB. Since there has been no reliability impact of those requirements not being enforceable for four years, there is no evidence they should be reinstated applicable to a different functional entity. Requirement 3 of INT-004 only requires the registration of data in the NAESB registry for the purpose " to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie." There is now an extensive NERC Pseudo-Tie Coordination Guideline. One of the primary guiding principles of periodic review teams is to determine if requirements are duplicative and whether they have a significant impact on reliability. Since R3 only serves to register Pseudo-Ties in a registry and their coordination is well-documented, it was unanimous there was no reliability benefit to retaining R3.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Southern would support retiring these requirements after they have been reviewed for inclusion into the NAESB WEQ Business Standards and subsequently ratified by FERC.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment. The proposed retirement of INT-004 is due to the fact that Requirements R1 and R2 have not been enforceable for four years now since the Purchasing Selling Entity was deregistered. Those requirements are already largely moved into NAESB and the remaining parts of them are proposed to be moved to NAESB. Since there has been no reliability impact of those requirements not being enforceable for four years, there is no evidence they should be reinstated applicable to a different functional entity. Requirement 3 of INT-004 only requires the registration of data in the NAESB registry for the purpose " to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie." There is now an extensive NERC Pseudo-Tie Coordination Guideline. One of the primary guiding principles of periodic review teams is to determine if requirements are duplicative and whether they have a significant impact on reliability. Since R3 only serves to register Pseudo-Ties in a registry and their coordination is well-documented, it was unanimous there was no reliability benefit to retaining R3.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power agrees with NSRF's recommendation.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from NSRF.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	

Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
PJM recommends that the retirement of R3 be contingent upon the implementation of a new NAESB WEQ-004 requirement which necessitates the coordination of Pseudo-ties between impacted entities prior to implementation. This coordination is important for accurate accounting of interchange and ensuring that any related congestion can be properly managed. Without this coordination, the reliability of the system could be impacted.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The proposed retirement of INT-004 is due to the fact that Requirements R1 and R2 have not been enforceable for four years now since the Purchasing Selling Entity was deregistered. Those requirements are already largely moved into NAESB and the remaining parts of them are proposed to be moved to NAESB. Since there has been no reliability impact of those requirements not being enforceable for four years, there is no evidence they should be reinstated applicable to a different functional entity. Requirement 3 of INT-004 only requires the registration of data in the NAESB registry for the purpose “ to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie.” There is now an extensive NERC Pseudo-Tie Coordination Guideline. One of the primary guiding principles of periodic review teams is to determine if requirements are duplicative	

and whether they have a significant impact on reliability. Since R3 only serves to register Pseudo-Ties in a registry and their coordination is well-documented, it was unanimous there was no reliability benefit to retaining R3.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to comments from ISO/RTO Council Standards Review Committee.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM recommends that the retirement of R3 be contingent upon the implementation of a new NAESB WEQ-004 requirement which necessitates the coordination of Pseudo-ties between impacted entities prior to implementation. This coordination is important for accurate accounting of interchange and ensuring that any related congestion can be properly managed. Without this coordination, the reliability of the system could be impacted.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. The proposed retirement of INT-004 is due to the fact that Requirements R1 and R2 have not been enforceable for four years now since the Purchasing Selling Entity was deregistered. Those requirements are already largely moved into NAESB and the remaining parts of them are proposed to be moved to NAESB. Since there has been no reliability impact of those requirements not being enforceable for four years, there is no evidence they should be reinstated applicable to a different functional entity. Requirement 3 of INT-004 only requires the registration of data in the NAESB registry for the purpose " to ensure that coordination occurs between all entities involved prior to the initial implementation of a Pseudo-Tie." There is now an extensive NERC Pseudo-Tie Coordination Guideline. One of the primary guiding principles of periodic review teams is to determine if requirements are duplicative and whether they have a significant impact on reliability. Since R3 only serves to register Pseudo-Ties in a registry and their coordination is well-documented, it was unanimous there was no reliability benefit to retaining R3.

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

7. The SDT is proposing to retire INT-006-4, Requirements R3.1, R4, and R5. Do you agree with the SDT's proposal to retire Requirements R3.1, R4, and R5 of INT-006-4? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

Summary Response:

The SDT received comments regarding the proposed retirement of INT-006-4 (R3.1, R4 and R5). The requirements in INT-006 (except for R3.1) proposed for retirement are those that are performed by software in accordance with the NAESB e-Tagging specification. There is no operator action occurring. These validation and notifications occur because of their inclusion in the e-Tagging specification. There are many actions that occur because of these specifications. All of them are not included in NERC requirements and yet they all occur. The retirement of these requirements does not take away visibility of the status of interchange as BAs and TSPs can always see the status of an interchange. Therefore, the performance of these requirements does not provide any visibility that isn't otherwise present.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	
Duke Energy disagrees with the proposed retirements for INT-006-4. We are not confident that this issue is adequately covered in the NAESB standards. Unlike the NERC standards which aim to promote reliability, the NAESB standards are commercially focused, and are not viewed as essential to maintaining a reliable system. We believe that not having these conditions outlined, could negatively impact reliability.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The requirements in INT-006 (except for R3.1) proposed for retirement are those that are performed by software in accordance with the NAESB e-Tagging specification. There is no operator action occurring. These validation and notifications	

occur because of their inclusion in the e-Tagging specification. There are many actions that occur because of these specifications. All of them are not included in NERC requirements and yet they all occur. The retirement of these requirements does not take away visibility of the status of interchange as BAs and TSPs can always see the status of an interchange. Therefore, the performance of these requirements does not provide any visibility that isn't otherwise present.

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer	No
Document Name	

Comment

Disagree, R4, R5 - North American Energy Standards Board (NAESB) e-Tagging specifications is not part of WEQ Business Practice Standards or approved by FERC, this will leave a responsibility gap for compliance.

Likes 0	
Dislikes 0	

Response

Thank you for your comment. If e-Tagging specifications are important for NAESB's purposes, NAESB is empowered to address them in NAESB's business practices. NERC's role is to establish requirements to maintain reliability and e-Tagging specifications are not related to Bulk Electric System reliability. The requirements in INT-006 (except for R3.1) proposed for retirement are those that are performed by software in accordance with the NAESB e-Tagging specification. There is no operator action occurring. These validation and notifications occur because of their inclusion in the e-Tagging specification. There are many actions that occur because of these specifications. All of them are not included in NERC requirements and yet they all occur. The retirement of these requirements does not take away visibility of the status of interchange as BAs and TSPs can always see the status of an interchange. Therefore, the performance of these requirements does not provide any visibility that isn't otherwise present.

Laura Nelson - IDACORP - Idaho Power Company - 1

Answer	No
Document Name	

Comment	
Idaho Power does not agree with retiring the R3.1 and R5 requirements. R3.1: It is important to define how long an entity has to approve or deny interchange. R5: Notification in a timely manner is needed.	
Likes 0	
Dislikes 0	
Response	
The requirements in INT-006 (except for R3.1) proposed for retirement are those that are performed by software in accordance with the NAESB e-Tagging specification. There is no operator action occurring. These validation and notifications occur because of their inclusion in the e-Tagging specification. There are many actions that occur because of these specifications. All of them are not included in NERC requirements and yet they all occur. The retirement of these requirements does not take away visibility of the status of interchange as BAs and TSPs can always see the status of an interchange. Therefore, the performance of these requirements does not provide any visibility that isn't otherwise present.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM supports the partial retirement of these standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	

Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power agrees with NSRF’s recommendation.	

Likes 0	
Dislikes 0	
Response	
Please see response to the comments from NSRF.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
R3.1 – There is no impact on reliability in requiring the RC being notified when a Reliability Adjustment Arranged Interchange has been denied. The RC is already notified of a denial via E-tag as required in the NAESB e-Tagging Specifications. R4 & R5 are duplicative of the NAESB e-Tagging Specifications Section and are not a reliability-related task performed by a NERC registered entity.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of these requirements.	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

8. *The SDT is proposing to retire INT-009-2.1, Requirement R2. Do you agree with the SDT's proposal to retire Requirement R2 of INT-009-2.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.

Summary Response:

The SDT received comments regarding the reference of INT-010 in Requirement R1 of INT-009-2.1. To avoid the potential confusion of having a reference to a retired standard in an active requirement, the SDT will remove this reference prior to posting the draft INT-009-3 standard for final ballot.

The SDT, having considered the issue, determined that removal of the INT-010 reference would be consistent with the SAR's recommendation to retire INT-010-2 and would constitute a non-substantive change that may be made prior to final ballot. The SDT further determined that removal of the INT-010 reference would result in no change to the purpose and intent of the Requirement and that no further changes to this Requirement are necessary. This determination has been vetted by NERC staff and the Standards Committee and it was determined to be a non-substantive change.

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of this requirement.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	

Answer	Yes
Document Name	
Comment	
The requirement is redundant and qualifies for retirement under Paragraph 81. The requirement for BAs to establish an agreed upon interchange meeting source is covered in BAL-005-1 R7.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Informationally, Paragraph 81 was adopted by the NERC Board of Trustees on February 7, 2013, filed with the appropriate regulatory authority on February 28, 2013, with a Final Rule issued November 21, 2013.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power agrees with NSRF's recommendation.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from NSRF.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	

Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM supports the partial retirement of these standards.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	

Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

9. ***The SDT is proposing to retire INT-010-2.1, Requirements R1, R2, and R3 (all). Do you agree with the SDT's proposal to retire INT-010-2.1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

To avoid the potential confusion of having a reference to a retired standard in an active requirement, the SDT will remove this reference prior to posting the draft INT-009-3 standard for final ballot.

The SDT, having considered the issue, determined that removal of the INT-010 reference would be consistent with the SAR's recommendation to retire INT-010-2 and would constitute a non-substantive change that may be made prior to final ballot. The SDT further determined that removal of the INT-010 reference would result in no change to the purpose and intent of the Requirement and that no further changes to this Requirement are necessary. This determination has been vetted by NERC staff and the Standards Committee and it was determined to be a non-substantive change.

Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	No
Document Name	
Comment	
ISO-NE agrees that the specific content of INT-010, creating an RFI or Reliability Adjusted Arranged Interchange after-the-fact, does not impact reliability. However, if INT-010 is to be retired, then INT-009 R1 must also be modified and that revision is not addressed in the Implementation Plan. INT-009-3 proposed as part of this effort continues to reference INT-010. Therefore, ISO-NE recommends that either INT-009 R1 be modified to simply remove the cross reference to INT-010 or that the retirement of INT-010 and corresponding changes required INT-009 R1 be moved to Phase 2 of this effort.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment. To avoid the potential confusion of having a reference to a retired standard in an active requirement, the SDT will remove this reference prior to posting the draft INT-009-3 standard for final ballot. The SDT, having considered the issue, determined that removal of the INT-010 reference would be consistent with the SAR's recommendation to retire INT-010-2 and would constitute a non-substantive change that may be made prior to final ballot. The SDT further determined that removal of the INT-010 reference would result in no change to the purpose and intent of the Requirement and that no further changes to this Requirement are necessary. This determination has been vetted by NERC staff and the Standards Committee and it was determined to be a non-substantive change.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	No
Document Name	
Comment	
Although AZPS agrees these requirements can and should be retired, their retirement must be done in coordination with changes to INT-009-2.1 R1, which references INT-010-2.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. To avoid the potential confusion of having a reference to a retired standard in an active requirement, the SDT will remove this reference prior to posting the draft INT-009-3 standard for final ballot. The SDT, having considered the issue, determined that removal of the INT-010 reference would be consistent with the SAR's recommendation to retire INT-010-2 and would constitute a non-substantive change that may be made prior to final ballot. The SDT further determined that removal of the INT-010 reference would result in no change to the purpose and intent of the Requirement and that no further changes to this Requirement are necessary. This determination has been vetted by NERC staff and the Standards Committee and it was determined to be a non-substantive change.	

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	No
Document Name	
Comment	
NPCC agrees that the specific content of INT-010, creating RFI or Reliability Adjusted Arranged Interchange after-the-fact, does not impact reliability. However, if INT-010 is to be retired, then INT-009 R1 must also be modified and that revision is not addressed in the Implementation Plan. INT-009-3 proposed as part of this effort continues to reference INT-010, Therefore, NPCC recommends that either INT-009 R1 be modified to simply remove the cross reference to INT-010 or that the retirement of INT-010 and corresponding changes required INT-009 R1 be moved to Phase 2 of this effort.	
Likes 1	Ontario Power Generation Inc., 5, Chitescu Constantin
Dislikes 0	
Response	
Thank you for your comment. To avoid the potential confusion of having a reference to a retired standard in an active requirement, the SDT will remove this reference prior to posting the draft INT-009-3 standard for final ballot. The SDT, having considered the issue, determined that removal of the INT-010 reference would be consistent with the SAR's recommendation to retire INT-010-2 and would constitute a non-substantive change that may be made prior to final ballot. The SDT further determined that removal of the INT-010 reference would result in no change to the purpose and intent of the Requirement and that no further changes to this Requirement are necessary. This determination has been vetted by NERC staff and the Standards Committee and it was determined to be a non-substantive change.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	

Duke Energy disagrees with the drafting team's proposal to retire this standard. The technical rationale document states that this standard can be retired because more stringent tagging requirements already exist under NAESB. Unlike the NERC standards which aim to promote reliability, the NAESB standards are commercially focused, and are not viewed as essential to maintaining a reliable system. While part of INT-010-2.1 may be commercial in nature, we believe that the standard generally supports the reliability of the grid. Also, NAESB is only applicable to jurisdictional entities. Not all entities that are currently NERC Registered Entities, fall under the jurisdiction of NAESB, and would not be required to adhere to any of its business practices.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. While all NERC registered entities may not be subject to NAESB business practices, BAs are expressly applicable under this standard are subject to NAESB business practices.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	No
Document Name	
Comment	
Disagree, NAESB WEQ BPS 004-1.7 reference NERC INT-010-2.1 R1 for energy sharing groups for conditions not submitting eTags. Not approved by FERC.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment. If e-Tagging specifications are important for NAESB purposes, NAESB is empowered to address them in NAESB's business practices. NERC's role is to establish requirements to maintain reliability and e-Tagging specifications are not related to Bulk Electric System reliability.

Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
OPG agrees with RSC position.	
Likes 0	
Dislikes 0	
Response	
Please see response to comment from RSC.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM recommends that the retirement of the standard be contingent upon a new NAESB WEQ-004 requirement becoming effective which allows interchange fitting the current INT-010-2.1 criteria to be implemented without an RFI. Such a requirement is currently published as WEQ-004-1.7 under the NAESB WEQ version 3.2 standards. However, the WEQ-004-1.7 requirement would need to be revised. Without this NAESB requirement, a Balancing Authority would not be able to implement interchange transactions described in INT-010-2.1 without an associated RFI which could jeopardize the reliability of the transmission system.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. If e-Tagging specifications are important for NAESB's purposes, NAESB is empowered to address them in NAESB's business practices. NERC's role is to establish requirements to maintain reliability and e-Tagging specifications are not related to Bulk Electric System reliability.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	

Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
PJM recommends that the retirement of the Standard be contingent upon a new NAESB WEQ-004 requirement becoming effective which allows interchange fitting the current INT-010-2.1 criteria to be implemented without an RFI. Such a requirement is currently published as WEQ-004-1.7 under the NAESB WEQ version 3.2 standards. However, the WEQ-004-1.7 requirement would need to be revised. Without this NAESB requirement, a Balancing Authority would not be able to implement interchange transactions described in INT-010-2.1 without an associated RFI which could jeopardize the reliability of the transmission system.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. If e-Tagging specifications are important for NAESB purposes, NAESB is empowered to address them in NAESB's business practices. NERC's role is to establish requirements to maintain reliability and e-Tagging specifications are not related to Bulk Electric System reliability.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments from Edison Electric Institute.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Minnesota Power agrees with NSRF's recommendation.	
Likes 0	
Dislikes 0	
Response	

Please see response to the comments from NSRF.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
The SRC agrees that the specific content of INT-010, creating an RFI or Reliability Adjusted Arranged Interchange after-the-fact, does not impact reliability. However, if INT-010 is to be retired, then INT-009 R1 must also be modified and that revision is not addressed in the Implementation Plan. INT-009-3 proposed as part of this effort continues to reference INT-010. Therefore, the SRC recommends that either INT-009 R1 be modified to simply remove the cross reference to INT-010 or that the retirement of INT-010 and corresponding changes required INT-009 R1 be moved to Phase 2 of this effort.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. To avoid the potential confusion of having a reference to a retired standard in an active requirement, the SDT will remove this reference prior to posting the draft INT-009-3 standard for final ballot. The SDT, having considered the issue, determined that removal of the INT-010 reference would be consistent with the SAR's recommendation to retire INT-010-2 and would constitute a non-substantive change that may be made prior to final ballot. The SDT further determined that removal of the INT-010 reference would result in no change to the purpose and intent of the Requirement and that no further changes to this Requirement are necessary. This determination has been vetted by NERC staff and the Standards Committee and it was determined to be a non-substantive change.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	

Comment	
R1, R2 and R3 are redundant because more stringent requirement(s) that meet the objectives are already included in the NAESB standards (WEQ-004-1 & WEQ-004-8) due to their commercial purposes. These requirements do little, if anything, to benefit or protect the reliable operation of the BES.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of these requirements. However, because INT-009-2.1 Requirement R1 refers to INT-010-2, it may be preferable to defer consideration to the retirement of the requirements in INT-010-2.1 to the SER Phase II effort.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. To avoid the potential confusion of having a reference to a retired standard in an active requirement, the SDT will remove this reference prior to posting the draft INT-009-3 standard for final ballot. The SDT, having considered the issue, determined that removal of the INT-010 reference would be consistent with the SAR's recommendation to retire INT-010-2 and would constitute a non-substantive change that may be made prior to final ballot. The SDT further determined that removal of the INT-010 reference would result in no change to the purpose and intent of the Requirement and	

that no further changes to this Requirement are necessary. This determination has been vetted by NERC staff and the Standards Committee and it was determined to be a non-substantive change.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

10. ***The SDT is proposing to retire IRO-002-5, Requirement R1. Do you agree with the SDT's proposal to retire Requirement R1 of IRO-002-5? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.**

Summary Response:

The SDT received comments regarding the proposed retirement of IRO-002-5 (R1). Requirement R1 and data exchange for the Operation Planning Analysis is inherent to Requirement R2 that actually has a higher Violation Risk Factor and is clearly tied to the Operation Planning Analysis in IRO-010-2, Requirement R3. The requirements in IRO-010-2 satisfy the obligations of identifying the data required and means for delivering the data for the Operational Planning Analysis, Real-time monitoring, and Real-time Assessments. This data exchange is accomplished via redundant/secure communications, such as: Inter Control Center Communication Protocol (ICCP), email, voltage schedules, outage scheduling that all RCs, Bas, and TOPs use to exchange the required data. Additionally, to comply with IRO-008-2, Requirement R1, the RC must have received all of the data it needs to perform the Operation Planning Analysis. Finally, Measure M1 for IRO-002-5, Requirement R1 states that an entity needs to have documentation describing its data exchange capabilities with other entities, which is administrative in nature. As such, the SDT determined that IRO-002-5, Requirement R1 is not needed to support reliability and can be retired.

Please note:

Proposed Reliability Standard IRO-002-7 reflects a change of version (during initial posting under this project it was posted as IRO-002-6) due to the addition of a new Variance for the WECC region, developed through the WECC standard development process and was adopted by the WECC Board of Directors on March 6, 2019.

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	No
Document Name	
Comment	

We believe the other requirements of IRO-002-5 are fundamentally based upon R1, as this requirement mandates RCs to have data exchange capabilities. Other requirements in this standard refer to this term periodically. As such, eliminating this requirement would diminish clarity regarding expectations in the remaining requirements. If R1 is retired it could be merged with R2 so that there is a single requirement discussing all data exchange capabilities needed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. Requirement R1 and data exchange for the Operation Planning Analysis is inherent to Requirement R2 that actually has a higher Violation Risk Factor and is clearly tied to the Operation Planning Analysis in IRO-010-2, Requirement R3. The requirements in IRO-010-2 satisfy the obligations of identifying the data required and means for delivering the data for the Operational Planning Analysis, Real-time monitoring, and Real-time Assessments. This data exchange is accomplished via redundant/secure communications, such as: Inter Control Center Communication Protocol (ICCP), email, File Transfer Protocol (FTP), outage scheduling tools that all RCs, BAs, and TOPs use to exchange the required data. Additionally, to comply with IRO-008-2, Requirement R1, the RC must have received all of the data it needs to perform the Operation Planning Analysis. Finally, Measure M1 for IRO-002-5, Requirement R1 states that an entity needs to have documentation describing its data exchange capabilities with other entities, which is administrative in nature. As such, the SDT determined that IRO-002-5, Requirement R1 is not needed to support reliability and can be retired.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No
Document Name	
Comment	
Texas RE is concerned that if IRO-002-5 Requirement R1 was eliminated, Reliability Coordinators may not put emphasis specifically on having data exchange capabilities with their Balancing Authorities and Transmission Operators. This could also lead to a larger engagement scope and the inclusion of IRO-008-2 R1, and IRO-010-2 Requirements R1, R2, and R3, instead of just including IRO-002-5 Requirement R1.	

Likes 0	
Dislikes 0	

Response

Thank you for your comment. Requirement R1 and data exchange for the Operation Planning Analysis is inherent to Requirement R2 that actually has a higher Violation Risk Factor and is clearly tied to the Operation Planning Analysis in IRO-010-2, Requirement R3. The requirements in IRO-010-2 satisfy the obligations of identifying the data required and means for delivering the data for the Operational Planning Analysis, Real-time monitoring, and Real-time Assessments. This data exchange is accomplished via redundant/secure communications, such as: Inter Control Center Communication Protocol (ICCP), email, File Transfer Protocol (FTP), outage scheduling tools that all RCs, BAs, and TOPs use to exchange the required data. Additionally, to comply with IRO-008-2, Requirement R1, the RC must have received all of the data it needs to perform the Operation Planning Analysis. Finally, Measure M1 for IRO-002-5, Requirement R1 states that an entity needs to have documentation describing its data exchange capabilities with other entities, which is administrative in nature. As such, the SDT determined that IRO-002-5, Requirement R1 is not needed to support reliability and can be retired.

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer	Yes
Document Name	

Comment

ERCOT is not opposed to the retirement of this requirement.

Likes 0	
Dislikes 0	

Response

Thank you for your comment.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	Yes
Document Name	

Comment	
Southern determined that this requirement should be retired as it does not add any additional benefit to reliability. Before an entity is certified to perform the RC function, it must first demonstrate that it has adequate communications (both data and voice) to communicate with BAs and TOPs in its RC area and with those entities adjacent to its RC area. In addition, the RC function is on a 3 year audit cycle and must continue to demonstrate that it has those communication capabilities to remain certified.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	

Comment	
IRO-002-5 was not reviewed as we are not a RC and therefore the standard is not applicable.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

11. ***The SDT is proposing to retire MOD-004-1, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, and R12 (all). Do you agree with the SDT's proposal to retire MOD-004-1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC Standards of Conduct (SOC) violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer	No
Document Name	Attach_DE_SER Question 11_Apr 2019.docx

Comment

While Duke Energy would support the retirement of these MOD standards, we cannot do so if MOD-001-2 is withdrawn. The MOD standards promote reliability of the grid by putting in place common boundaries and provisions that are necessary for various calculations that need to be performed. These calculations are important to reliability by providing the baseline for understanding the operational need. By retiring the MOD standards, and not having MOD-001-2 in place, there will not be provisions in place to aid an

entity in calculating transfer capability. There will not be any boundaries in place for the curtailment of service. We disagree with the commercial based focus that the drafting team took in the technical rationale document. While these MOD standards (and ATC calculation) may have some commercial based elements to them, they also put in place valuable boundaries that help promote consistency in how the industry calculates these values. Removing these boundaries does not promote reliability for the Bulk Electric System and introduces additional burden to the real-time System Operator. **The expectation of the System Operators to ensure the reliability of the BES in the real-time when there have been no requirements to ensure how ATC is calculated or coordinated beyond what is required by NAESB is unrealistic. Some of the most glaring issues with relying solely upon NAESB to regulate the calculation of ATC are: FERC does not have oversight for non-jurisdictional TSPs and therefore cannot require them to incorporate NAESB standards. Also, while NAESB has acted on the recommendations of the MOD-A project to incorporate any of the gaps created by the retirement of MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a, MOD-030-3 and adoption of MOD-001-2, FERC has not acted on either the NERC or NAESB filings. Further, NAESB has not been requested to modify proposed standards to incorporate any of the gaps created by the retirement of the proposed MOD-001-2.** **Additionally, the lack of any NERC regulation for consistent ATC methodologies and requirements for sharing of data and could potentially lead to an increase of TLRs being called as this would be the only tool System Operators could utilize to combat rampant loop flow impacts on the BES. This could very well lead to capacity concerns and load shedding as the increase in TLRs could include firm curtailments causing capacity shortages. Without mandatory ATC standards, a TSP would be able to sell as much service as possible. The overselling of service and the overscheduling of ATC Paths will lead to an increase of FIRM TLR, potentially forcing Transmission Operators and Load Serving Entities to shed FIRM load to comply with the TLR. Over the past eight years the MOD-001, 28,29, & 30 standards have been effective the industry has seen a dramatic reduction in FIRM TLRs.** **Included in the Attachment with Duke Energy's response to this question is the rolling 12-month average of TLRs from the NERC website. Notice the reduction in TLRs from 2008-2011 when the MOD standards were first published (in 2008 when TSP started to incorporate the MOD standards into their ATC methodologies) and 2011 (when the MOD standards were mandatory and enforceable).**	
Likes 0	
Dislikes 0	
Response	

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as “The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider’s system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.”

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC Standards of Conduct (SOC) violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	

Southern continues to disagree with the SER Team's proposed petition for the withdrawal of MOD-001-2. Again, we believe that the combined effect of enacting MOD-001-2 while migrating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 MOD into the NAESB standards strike an appropriate balance of addressing reliability related concerns, while incorporating any market related issues. Simply stating that ATC/AFC calculations are primarily commercially-focused elements and that there are mechanisms in place to address reliability in real time is an oversimplification of the ATC/AFC concept. Inaccurately modeling and assessing transfer capability which considers real physical transmission limits on both the host and neighboring systems can create extremely complicated situations in real-time that can unduly burden system operators.

However, since FERC has not yet approved MOD-001-2 and has yet to take action on incorporating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 and NAESB's WEQ-23 into the current NAESB standards, Southern Company recommends delaying the retirement of those existing NERC standards. The objective is to have MOD-001-2 in place at the same time as those

submitted to FERC by NAESB. Once approved by the Commission, the industry should have adequate time to ensure a seamless transition to the new construct.	
Likes 0	
Dislikes 0	

Response

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

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There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts: Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions. Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. **Requirement R6:** If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
No Comment as long as all MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030 are retired together.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM was heavily involved in the MOD-001-2 and NAESB WEQ-023 development efforts. PJM is neutral on the proposed retirement of MOD-001-2 but supports the position of the SER for the existing MOD standards as reliability components of congestion management are handled amongst eastern interconnect parties through various established coordination processes. PJM cautions against additional revisions to the NAESB WEQ-023 document, especially those driven by issues unique to particular seams or between specific entities, as those issues may not be realized by other parties. Therefore, blanket revisions may unnecessarily impact reliability and/or market aspects for other entities.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
See response to Q17.	
Likes 0	
Dislikes 0	
Response	
Please see response to comment in Question 17.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	

Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	

ERCOT is not opposed to the retirement of these requirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	
Response	

Thank you for your comment.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

12. *The SDT is proposing to retire MOD-008-1, Requirements R1, R2, R3, R4, and R5 (all). Do you agree with the SDT's proposal to retire MOD-008-1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.

Summary Response:

Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	No
Document Name	

Comment

Southern continues to disagree with the SER Team’s proposed petition for the withdrawal of MOD-001-2. Again, we believe that the combined effect of enacting MOD-001-2 while migrating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 MOD into the NAESB standards strike an appropriate balance of addressing reliability related concerns, while incorporating any market related issues. Simply stating that ATC/AFC calculations are primarily commercially-focused elements and that there are mechanisms in place to address reliability in real time is an oversimplification of the ATC/AFC concept. Inaccurately modeling and assessing transfer capability which considers real physical transmission limits on both the host and neighboring systems can create extremely complicated situations in real-time that can unduly burden system operators.

However, since FERC has not yet approved MOD-001-2 and has yet to take action on incorporating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 and NAESB's WEQ-23 into the current NAESB standards, Southern Company recommends delaying the retirement of those existing NERC standards. The objective is to have MOD-001-2 in place at the same time as those submitted to FERC by NAESB. Once approved by the Commission, the industry should have adequate time to ensure a seamless transition to the new construct.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is

explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for “Other SOLs.”

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as “The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider’s system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.”

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer	No
Document Name	
Comment	

TVA disagrees with the retirement of these standards at this time.

Until a resolution is reached on NAESB's WEQ-023, and these items are incorporated by reference per the FERC Commission, retirement of these MOD Reliability Standards would leave a significant gap of reliability of ATC in the industry. WEQ-023 (submitted under Version 003.1) was not approved by the Commission to be incorporated by reference at this time and is being considered under an overall inquiry into ATC calculation. This leaves the standard, as written in NAESB as voluntary. MOD-001-2 was drafted with the mindset of leaving only reliability aspects of ATC under NERC oversight and WEQ-023 being approved by the Commission. If MOD-001-2 is withdrawn, there would be no reliability push for ATC requirements under FERC and could potentially cause further delay. Removal of these standards could impact the transparency that is established with sharing data with neighbors as well.

According to Project 2012-05 ATC Revisions (MOD A), MOD-001-2 was developed to address directives in Order No. 729 to modify certain aspects of the MOD A standards and to consolidate the MOD A standards into a single standard covering only the 'reliability-related impact of ATC and AFC calculations'. The consolidated approach was intended to maintain NERC's focus on developing and retaining requirements that support the reliable operation of the Bulk-Power System (BPS).

The WEQ-023 standards drafted did not incorporate honoring neighboring systems nor ensure an entity have an ATCID, or TRMID, or CBMID because the thought was that it would be laid out in the NERC space under MOD-001-2. So NAESB would have to incorporate all of this into the business practice, which would blur the lines of reliability and commercial that the project was developed to address.

TVA agrees with the goal of the Standards Efficiency Review Team to decrease the number of requirements and make the standards less confusing and less burdensome. Yet, it is important that the standards still ensure a relatively consistent and reliable calculation of transfer capability. TVA feels the accurate calculation of transfer capability is a reliability issue. It is the job of the operations planners to give the operators a system that was planned to be reliable. If the operators are given a system that has numerous n-1 overloads planned into the system, then the operational planning engineers did not do their job. We do not want our operators to intentionally have to handle numerous TLRs and generation re-dispatch because of an oversold system. If the TOP and TSP oversell the system, it may be difficult for the operators to maintain system reliability. A transmission system constantly in TLR3 and TLR5 due to inaccurate calculations of transfer capability is a reliability issue and not just a commercial issue. If your neighbor is constantly selling transfer capability and

ignoring the impact on your system, this too will affect your reliability. This does not just impact transmission costs as some would believe.	
Likes 0	
Dislikes 0	

Response

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

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Requirement R3: CBM is defined as “The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider’s system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.”

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy

Answer	No
Document Name	

Comment

See response to question 11.

Likes 0	
Dislikes 0	

Response

Please see response to comment in Question 11.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of these requirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes

Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	

PJM was heavily involved in the MOD-001-2 and NAESB WEQ-023 development efforts. PJM is neutral on the proposed retirement of MOD-001-2 but supports the position of the SER for the existing MOD standards as reliability components of congestion management are handled amongst eastern interconnect parties through various established coordination processes. PJM cautions against additional revisions to the NAESB WEQ-023 document, especially those driven by issues unique to particular seams or between specific entities, as those issues may not be realized by other parties. Therefore, blanket revisions may unnecessarily impact reliability and/or market aspects for other entities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	

Comment	
No Comment as long as all MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030 are retired together.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

13. ***The SDT is proposing to retire MOD-028-2, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, and R11 (all). Do you agree with the SDT's proposal to retire MOD-028-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as “The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider’s system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.”

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts: Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions. Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. **Requirement R6:** If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	
See response to question 11.	
Likes 0	
Dislikes 0	

Response	
Please see response to comment in Question 11.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern continues to disagree with the SER Team's proposed petition for the withdrawal of MOD-001-2. Again, we believe that the combined effect of enacting MOD-001-2 while migrating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 MOD into the NAESB standards strike an appropriate balance of addressing reliability related concerns, while incorporating any market related issues. Simply stating that ATC/AFC calculations are primarily commercially-focused elements and that there are mechanisms in place to address reliability in real time is an oversimplification of the ATC/AFC concept. Inaccurately modeling and assessing transfer capability which considers real physical transmission limits on both the host and neighboring systems can create extremely complicated situations in real-time that can unduly burden system operators. However, since FERC has not yet approved MOD-001-2 and has yet to take action on incorporating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 and NAESB's WEQ-23 into the current NAESB standards, Southern Company recommends delaying the retirement of those existing NERC standards. The objective is to have MOD-001-2 in place at the same time as those submitted to FERC by NAESB. Once approved by the Commission, the industry should have adequate time to ensure a seamless transition to the new construct.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators	

must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. **Requirement R6:** If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
No Comment as long as all MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030 are retired together.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM was heavily involved in the MOD-001-2 and NAESB WEQ-023 development efforts. PJM is neutral on the proposed retirement of MOD-001-2 but supports the position of the SER for the existing MOD standards as reliability components of congestion management are handled amongst eastern interconnect parties through various established coordination processes. PJM cautions against additional revisions to the NAESB WEQ-023 document, especially those driven by issues unique to particular seams or between specific entities, as those issues may not be realized by other parties. Therefore, blanket revisions may unnecessarily impact reliability and/or market aspects for other entities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The NAESB WEQ-023 document is out of scope for this SDT.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	

The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
See response to Q17.	
Likes 0	
Dislikes 0	
Response	
Please see response to comment in Question 17.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see responses to comments submitted by Edison Electric Institute.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of these requirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	

Answer	
Document Name	
Comment	
Not applicable to the IESO	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	

Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

14. ***The SDT is proposing to retire MOD-029-2a, Requirements R1, R2, R3, R4, R5, R6, R7, and R8 (all). Do you agree with the SDT's proposal to retire MOD-029-2a? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	No
Document Name	

Comment

Southern continues to disagree with the SER Team’s proposed petition for the withdrawal of MOD-001-2. Again, we believe that the combined effect of enacting MOD-001-2 while migrating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 MOD into the NAESB standards strike an appropriate balance of addressing reliability related concerns, while incorporating any market related issues. Simply stating that ATC/AFC calculations are primarily commercially-focused elements and that there are mechanisms in place to address reliability in real time is an oversimplification of the ATC/AFC concept. Inaccurately modeling and assessing transfer capability which considers real physical transmission limits on both the host and neighboring systems can create extremely complicated situations in real-time that can unduly burden system operators.

However, since FERC has not yet approved MOD-001-2 and has yet to take action on incorporating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 and NAESB's WEQ-23 into the current NAESB standards, Southern Company recommends delaying the retirement of those existing NERC standards. The objective is to have MOD-001-2 in place at the same time as those submitted to FERC by NAESB. Once approved by the Commission, the industry should have adequate time to ensure a seamless transition to the new construct.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is

explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method. Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative. Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty. Requirement R5 and its Requirement Parts: Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions. Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. **Requirement R6:** If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No

Document Name	
Comment	
See response to question 11.	
Likes 0	
Dislikes 0	
Response	
Please see response to comment in Question 11.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of these requirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	

Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
The current standard addresses aspects that are commercial in nature. The reliability assessment requirement for determining transfer limits is addressed in FAC-11	

Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
LDWP agrees that this standard no longer directly impacts system reliability. However, there should be a standardization of TTC/ATC calculation so that there is uniformity between entities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
See response to Q17.	
Likes 0	
Dislikes 0	

Response	
Please see response to comment in Question 17.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM was heavily involved in the MOD-001-2 and NAESB WEQ-023 development efforts. PJM is neutral on the proposed retirement of MOD-001-2 but supports the position of the SER for the existing MOD standards as reliability components of congestion management are handled amongst eastern interconnect parties through various established coordination processes. PJM cautions against additional revisions to the NAESB WEQ-023 document, especially those driven by issues unique to particular seams or between specific entities, as those issues may not be realized by other parties. Therefore, blanket revisions may unnecessarily impact reliability and/or market aspects for other entities.	
Likes 0	

Dislikes 0	
Response	
Thank you for your comment.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
No Comment as long as all MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030 are retired together.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

15. *The SDT is proposing to retire MOD-030-3, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9 and R10 (all). Do you agree with the SDT's proposal to retire MOD-030-3? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.

Summary Response:

Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts: Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions. Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. **Requirement R6:** If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	
See response to question 11.	
Likes 0	
Dislikes 0	

Response	
Please see response to comments in Question 11.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	No
Document Name	
Comment	

TVA disagrees with the retirement of these standards at this time.

Until a resolution is reached on NAESB's WEQ-023, and these items are incorporated by reference per the FERC Commission, retirement of these MOD Reliability Standards would leave a significant gap of reliability of ATC in the industry. WEQ-023 (submitted under Version 003.1) was not approved by the Commission to be incorporated by reference at this time and is being considered under an overall inquiry into ATC calculation. This leaves the standard, as written in NAESB as voluntary. MOD-001-2 was drafted with the mindset of leaving only reliability aspects of ATC under NERC oversight and WEQ-023 being approved by the Commission. If MOD-001-2 is withdrawn, there would be no reliability push for ATC requirements under FERC and could potentially cause further delay. Removal of these standards could impact the transparency that is established with sharing data with neighbors as well.

According to Project 2012-05 ATC Revisions (MOD A), MOD-001-2 was developed to address directives in Order No. 729 to modify certain aspects of the MOD A standards and to consolidate the MOD A standards into a single standard covering only the 'reliability-related impact of ATC and AFC calculations'. The consolidated approach was intended to maintain NERC's focus on developing and retaining requirements that support the reliable operation of the Bulk-Power System (BPS).

The WEQ-023 standards drafted did not incorporate honoring neighboring systems nor ensure an entity have an ATCID, or TRMID, or CBMID because the thought was that it would be laid out in the NERC space under MOD-001-2. So NAESB would have to incorporate all of this into the business practice, which would blur the lines of reliability and commercial that the project was developed to address.

TVA agrees with the goal of the Standards Efficiency Review Team to decrease the number of requirements and make the standards less confusing and less burdensome. Yet, it is important that the standards still ensure a relatively consistent and reliable calculation of transfer capability. TVA feels the accurate calculation of transfer capability is a reliability issue. It is the job of the operations planners to give the operators a system that was planned to be reliable. If the operators are given a system that has numerous n-1 overloads planned into the system, then the operational planning engineers did not do their job. We do not want our operators to intentionally have to handle numerous TLRs and generation re-dispatch because of an oversold system. If the TOP and TSP oversell the system, it may be difficult for the operators to maintain system reliability. A transmission system constantly in TLR3 and TLR5 due to inaccurate calculations of transfer capability is a reliability issue and not just a commercial issue. If your neighbor is constantly selling transfer capability and ignoring the impact on your system, this too will affect your reliability. This does not just impact transmission costs as some would believe.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty. **Requirement R5** and its Requirement Parts: Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions. Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. **Requirement R6:** If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	

Southern continues to disagree with the SER Team's proposed petition for the withdrawal of MOD-001-2. Again, we believe that the combined effect of enacting MOD-001-2 while migrating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 MOD into the NAESB standards strike an appropriate balance of addressing reliability related concerns, while incorporating any market related issues. Simply stating that ATC/AFC calculations are primarily commercially-focused elements and that there are mechanisms in place to address reliability in real time is an oversimplification of the ATC/AFC concept. Inaccurately modeling and assessing transfer capability which considers real physical transmission limits on both the host and neighboring systems can create extremely complicated situations in real-time that can unduly burden system operators.

However, since FERC has not yet approved MOD-001-2 and has yet to take action on incorporating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 and NAESB's WEQ-23 into the current NAESB standards, Southern Company recommends delaying the retirement of those existing NERC standards. The objective is to have MOD-001-2 in place at the same time as those submitted to FERC by NAESB. Once approved by the Commission, the industry should have adequate time to ensure a seamless transition to the new construct.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

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There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

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Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

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Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
No Comment as long as all MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030 are retired together.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	

Comment	
PJM was heavily involved in the MOD-001-2 and NAESB WEQ-023 development efforts. PJM is neutral on the proposed retirement of MOD-001-2 but supports the position of the SER for the existing MOD standards as reliability components of congestion management are handled amongst eastern interconnect parties through various established coordination processes. PJM cautions against additional revisions to the NAESB WEQ-023 document, especially those driven by issues unique to particular seams or between specific entities, as those issues may not be realized by other parties. Therefore, blanket revisions may unnecessarily impact reliability and/or market aspects for other entities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from ISO/RTO Council Standards Review Committee.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes

Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments submitted by Edison Electric Institute.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	

ERCOT is not opposed to the retirement of these requirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	
Document Name	
Comment	
Not applicable to the IESO	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

16. ***The SDT is proposing to retire MOD-001-1a, Requirements R1, R2, R3, R4, R5, R6, R7, R8 and R9 (all). Do you agree with the SDT's proposal to retire MOD-001-1a? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

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Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as “The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider’s system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.”

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

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Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	

Southern continues to disagree with the SER Team's proposed petition for the withdrawal of MOD-001-2. Again, we believe that the combined effect of enacting MOD-001-2 while migrating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 MOD into the NAESB standards strike an appropriate balance of addressing reliability related concerns, while incorporating any market related issues. Simply stating that ATC/AFC calculations are primarily commercially-focused elements and that there are

mechanisms in place to address reliability in real time is an oversimplification of the ATC/AFC concept. Inaccurately modeling and assessing transfer capability which considers real physical transmission limits on both the host and neighboring systems can create extremely complicated situations in real-time that can unduly burden system operators. However, since FERC has not yet approved MOD-001-2 and has yet to take action on incorporating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 and NAESB's WEQ-23 into the current NAESB standards, Southern Company recommends delaying the retirement of those existing NERC standards. The objective is to have MOD-001-2 in place at the same time as those submitted to FERC by NAESB. Once approved by the Commission, the industry should have adequate time to ensure a seamless transition to the new construct.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules." **MOD-001-2:** **Requirement R1:** TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is	

explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for “Other SOLs.”

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

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There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method. Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative. **Requirement R4:** The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty. **Requirement R5** and its Requirement Parts: Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions. Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. **Requirement R6:** If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No

Document Name	
Comment	
See response to question 11.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments in Question 11.	
Chris Wagner - Santee Cooper - 1	
Answer	No
Document Name	
Comment	
MOD001 requires that all registered TOPs establish reliability boundaries in which the TSPs can operate to maximize energy business transactions. By moving MOD-001 from under NERC responsibility, the BES reliability may be compromised. Transfer capability includes the impact on other areas due to the transfer of electric power.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated:	

"NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

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Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

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There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

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Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

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Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of these requirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	

Response	
Please see response to the comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
MOD-001-1a allows Transmission Operators to select, on the record, the methodology for computing the Available Transfer Capability in a standardized manner, which is the foundation for establishing the quantity of transmission capacity, in excess of native load needs and existing commitments, that may be sold to wholesale transmission customers in a fair and transparent fashion via Open Access Same-Time Information System (OASIS). Absent MOD-001-1a or its successor that meets the same objective, Transmission Operators may be at liberty to craft methodology to calculate ATC that may not be in alignment with the industry. This condition, if it prevails, will lead to unfair practice wherein some Transmission Operator may be held to a higher standard while others will be held to a lower standard. This, in turn, creates a less transparent environment for transmission customers to assess how Transmission Operators derive ATC.	

Likes 0	
Dislikes 0	

Response

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

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Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority

Answer	Yes
Document Name	

Comment

See response to Q17.

Likes 0	
Dislikes 0	

Response

Please see response to comments in Question 17.

Richard Vine - California ISO - 2

Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM was heavily involved in the MOD-001-2 and NAESB WEQ-023 development efforts. PJM is neutral on the proposed retirement of MOD-001-2 but supports the position of the SER for the existing MOD standards as reliability components of congestion management are handled amongst eastern interconnect parties through various established coordination processes. PJM cautions against additional revisions to the NAESB WEQ-023 document, especially those driven by issues unique to particular seams or between specific entities, as those issues may not be realized by other parties. Therefore, blanket revisions may unnecessarily impact reliability and/or market aspects for other entities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
No Comment as long as all MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030 are retired together.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains	

Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

17. *The SDT is proposing to withdraw Reliability Standard, MOD-001-2, which is currently pending approval by applicable governmental authorities. Do you agree with the SDT's proposal to withdraw Reliability Standard MOD-001-2? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*.

Summary Response:

Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Chris Wagner - Santee Cooper - 1	
Answer	No
Document Name	
Comment	
Recommend that the revised MOD-001-2 move forward as the current in force MOD-001 standard.	
Likes 0	
Dislikes 0	

Response
Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules." **MOD-001-2:** **Requirement R1:** TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against. Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs." Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9. Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs. Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation. **Requirement R6:** If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No
Document Name	
Comment	
See response to question 11.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments in Question 11.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	No

Document Name	
Comment	
NERC petitioned FERC for approval of MOD-001-2 in February 2014. The implementation plan called for the retirement of MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-1, MOD-029-1a, and MOD-030-2. In the petition, NERC characterized the purpose of MOD-001-2 as helping to “ensure that determinations of ATC and AFC are accomplished in a manner that supports the reliable operation of the Bulk Power System.” MOD-001-2 was developed under NERC’s standard development process and was adopted by the NERC Board of Trustees. Now, five plus years after the petition was filed, and with no publicly visible action by FERC on the petition beyond a NOPR issued in June 2014, the SER drafting team is suggesting the petition for MOD-001-2 be withdrawn. It’s not clear how the Real-time operators monitoring of SOLs and IROLs helps ensure that determinations of ATC and AFC are accomplished in a manner that supports the reliable operation of the Bulk Power System. If there are no standards addressing the determinations of ATC and AFC, you can expect that Real-time operators will be dealing with more SOLs and IROLs in the future.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC’s statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it’s stated: “NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system.” FERC acknowledged this in their March 15, 2015 Order, where they stated: “…we approve NERC’s proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules.”	

MOD-001-2:

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Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

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Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	No
Document Name	
Comment	
Southern continues to disagree with the SDT's proposed petition for the withdrawal of MOD-001-2. Again, we believe that the combined effect of enacting MOD-001-2 while migrating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 MOD into the NAESB standards would strike an appropriate balance of addressing reliability related concerns, while incorporating any market related issues. However, since FERC has not yet approved MOD-001-2 nor has not yet taken any action on incorporating MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a and MOD-030-3 and NAESB's WEQ-23 into the current NAESB standards, Southern Company recommends delaying the retirement of those standards until they are subsequently approved by the Commission (FERC). Once approved by the Commission, the industry should have adequate time to ensure a seamless transition to the new construct.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a	

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well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen

Answer	Yes
Document Name	
Comment	
No Comment as long as all MOD-001, MOD-004, MOD-008, MOD-028, MOD-029, and MOD-030 are retired together.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	

Answer	Yes
Document Name	
Comment	
PJM was heavily involved in the MOD-001-2 and NAESB WEQ-023 development efforts. PJM is neutral on the proposed retirement of MOD-001-2 but supports the position of the SER for the existing MOD standards as reliability components of congestion management are handled amongst eastern interconnect parties through various established coordination processes. PJM cautions against additional revisions to the NAESB WEQ-023 document, especially those driven by issues unique to particular seams or between specific entities, as those issues may not be realized by other parties. Therefore, blanket revisions may unnecessarily impact reliability and/or market aspects for other entities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from ISO/RTO Council Standards Review Committee.	

Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
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Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
MOD-001-1a allows Transmission Operators to select, on the record, the methodology for computing the Available Transfer Capability in a standardized manner, which is the foundation for establishing the quantity of transmission capacity, in excess of native load needs and existing commitments, that may be sold to wholesale transmission customers in a fair and transparent fashion via Open Access Same-Time Information System (OASIS). Absent MOD-001-1a or its successor that meets the same objective, Transmission Operators may be at liberty to craft methodology to calculate ATC that may not be in alignment with the industry. This condition, if it prevails, will lead to unfair practice wherein some Transmission Operator may be held to a higher standard while others	

will be held to a lower standard. This, in turn, creates a less transparent environment for transmission customers to assess how Transmission Operators derive ATC.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules." **MOD-001-2:** **Requirement R1:** TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against. Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs." Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.	

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC

Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments submitted by Edison Electric Institute.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

18. ***The SDT is proposing to retire MOD-020-0, Requirement R1 (all). Do you agree with the SDT's proposal to retire MOD-020-0? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as "The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider's system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies."

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations

Answer	Yes
Document Name	

Comment

Although ACES agrees with the retirement of this Standard, the technical justifications for retirement of requirement 1 requires additional clarification as it creates confusions. More specifically, SAR suggests a different justification than what was provided in slides versus slide 17 from the Industry Webinar which was held on 3/21/19 Outreach Webinar.

Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT drafted additional justifications for MOD-020-0 during the development of the project, subsequent to the SAR approval.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of these requirements.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	

Response	
Please see response to the comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Leonard Kula - Independent Electricity System Operator - 2	
Answer	Yes
Document Name	
Comment	
Duplicative of data provision requirements in MOD-031-2 and IRO-010-2 standards	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Richard Vine - California ISO - 2	

Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
PJM was heavily involved in the MOD-001-2 and NAESB WEQ-023 development efforts. PJM is neutral on the proposed retirement of MOD-001-2 but supports the position of the SER for the existing MOD standards as reliability components of congestion management are handled amongst eastern interconnect parties through various established coordination processes. PJM cautions against additional revisions to the NAESB WEQ-023 document, especially those driven by issues unique to particular seams or between specific entities, as those issues may not be realized by other parties. Therefore, blanket revisions may unnecessarily impact reliability and/or market aspects for other entities.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anthony Jablonski - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have comments on this question.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

19. ***The SDT is proposing to retire PRC-004-5(i), Requirement R4. Do you agree with the SDT's proposal to retire Requirement R4 of PRC-004-5(i)? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

The SDT received comments stating that the retirement of PRC-004-5(i) Requirement R4 could potentially burden the entity with an open item, with no closing date, hoping that a new technological break-through will finally determine the cause of misoperation. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions subject the quarterly data to a peer review of submittals, which then has the opportunity to further question the entity if needed.

Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison

Answer	No
Document Name	

Comment

The retirement of PRC-004-5(i) could potentially burden the entity with an open item, with no closing date, hoping that a new technological break-through will finally determine the cause of misoperation. We believe entities will simply declare that no cause for the misoperation was identified and be done with it.

If R4 is retired, one or both of the following approaches will likely be taken by entities:

· Delaying formal declaration of a misoperation for all disturbances until the root cause is identified or until 120 days expires.

· Declaring the cause for a greater percentage of misoperations as "unknown" and not performing the detailed testing to find the true root cause for an issue that is intermittent.

This is not beneficial to the goal of reliability improvements and reduced misoperations.

We recommend that the SDT consider how the ability to declare that “no cause of a misoperation was identified” be retained within the standard to document the end of an investigation. We are concerned that the removal of the ability to declare that no cause of a misoperation was identified may result in audit and compliance concerns.	
Likes 1	Ontario Power Generation Inc., 5, Chitescu Constantin
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submit the quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Please see the redline version of the standard’s flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	No
Document Name	
Comment	
If R4 is retired, one or both of the following approaches will likely be taken by entities: • Delaying formal declaration of a misoperation for all disturbances until the root cause is identified or until 120 days expires. • Declaring the cause for a greater percentage of misoperations as “unknown” and not performing the detailed testing to find the true root cause for an issue that is intermittent. This is not beneficial to the goal of reliability improvements and reduced misoperations.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submit the quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Please see the redline version of the standard’s flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	

Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	No
Document Name	
Comment	
OPG agrees with RSC position.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments by RSC.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No
Document Name	
Comment	
Texas RE is concerned that eliminating a requirement to investigate and track Misoperations could lead to entities not investigating the cause of a Misoperation. The SDT states the Requirement R4 acts as a control to support Requirements R1 and R3. Requirements R1 and R3 are different though, in that they are in place to determine *whether or not a Misoperation occurred*. Requirement R4 is to determine the *cause* of the Misoperation. Understanding the cause of a Misoperation can help prevent Misoperations in the future. Indeterminate causes of Misoperations are difficult issues that can provide valuable lessons for all entities involved in system protection. Protection System Misoperations continue to be a significant reliability risk factor and exacerbate the impact of transmission outages. In the 2017 State of Reliability Report, 9% of the Misoperations were categorized as “Unknown/Unexplainable”. The 2018 State of Reliability Report noted that “Protection system Misoperation should remain an area of focus, as it continues to be one of the largest contributors to the severity of transmission outages.” The 2018 State of Reliability report shows no decline in the percentage (9%) which is indicative that more focus is needed. Tracking the issues, if actively pursued, may help entities across the ERO understand complex	

issues when the cause of a Misoperation is identified. Removal of this Requirement disincentivizes an entity in continuing to find Misoperation causes which then, if found, be used to improve reliability.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submit the quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Please see the redline version of the standard's flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	No
Document Name	
Comment	
ERCOT does not support the outright retirement of PRC-004-5(i), Requirement R4 because to do so would eliminate the requirement to investigate in its entirety. However, ERCOT agrees that the Requirement as written may impose unnecessary burden by requiring repeated investigations despite the potential inability of a Transmission Owner, Generator Owner, or Distribution Provider to identify the cause(s) of a Misoperation.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submit the quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Please see the redline version of the standard's flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	
Anthony Jablonski - ReliabilityFirst - 10	
Answer	No

Document Name	Project 2018-03 PRC-004-6 R4 Comments.docx
Comment	

ReliabilityFirst does not agree with the removal of PRC-004-6 Requirement R4 for the following reason:

The concept of a declaration for no identifiable cause is currently introduced in R4 and in the Application Guidelines (now called Supplemental Material) for R4. The one statement from the Application Guidelines for R4 in version 5(i) states,

‘The entity’s investigation is complete when it identifies the cause of the Misoperation or makes a declaration that no cause was determined. The declaration is intended to be used if the entity determines that investigative actions have been exhausted or have not provided direction for identifying the Misoperation cause. Historically, approximately 12% of Misoperations are unknown or unexplainable.’

This statement needs to be retained somewhere as an explanation for this use of the declaration. The declaration is also referenced in R5, but for a different reason (problem found but CAP won’t improve reliability of BES). The declaration associated with R4 would be a cause that is ‘unknown/unexplainable’ and all testing and analysis comes up empty. There wouldn’t be a CAP, since nothing was found broken, and the declaration is used to close the investigation. In MIDAS, the CAP Completion Status would be ‘declaration’ rather than improperly coding as ‘CAP – Complete’, since no CAP was developed.

As far as the administrative requirement of ‘corrective action at least once every two calendar quarters’, ReliabilityFirst recommends the following for consideration (see attached as well for redline of requirment):

R4:

Each Transmission Owner, Generator Owner, and Distribution Provider that has not determined the cause(s) of a Misoperation, for a Misoperation identified in accordance with Requirement R1 or R3, shall perform investigative action(s) to determine the cause(s) of the Misoperation [maintaining documentation in sufficient detail to provide clear delineation of the stage and findings of the investigation] until one of the following completes the investigation: *[Violation Risk Factor: High] [Time Horizon: Operations Assessment, Operations Planning]*

☐ The identification of the cause(s) of the Misoperation; or

☐ A declaration that no cause was identified.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submit the quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Please see the redline version of the standard's flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	
Thomas Foltz - AEP - 5	
Answer	No
Document Name	
Comment	
AEP does not agree that PRC-004-5(i) R4 meets the drafting team's "Evaluation Criteria for Retiring Reliability Standards Requirements", as the declaration of "no cause found" is made only within this obligation (i.e. "is not redundant"). Regarding the reliability rationale, we would agree that not all investigative actions in and of themselves improve reliability, however the ability to track investigative actions over an extended period of time ensures more rigor is applied to the investigative progress.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submit the quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Please see the redline version of the standard's flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes

Document Name	
Comment	
NA to ISO-NE and repeated attempts to determine a cause of relay misoperations as described by R4 don't appear to be productive.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	

Reclamation supports the retirement of PRC-004-5(i) Requirement R4. Reclamation recommends PRC-004-5(i) Requirement R5 be split into two requirements: one to develop a corrective action plan or explain in a declaration why corrective actions are beyond the entity's control or would not improve BES reliability, and that no further corrective actions will be taken; and one to evaluate the corrective action plan for applicability to the entity's other Protection Systems including other locations.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. PRC-004-5(i) Requirement R5 is out of the scope of this project.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
we are concerned that simply retiring this requirement could create some unintended negative consequences. As it is well understood, not all misoperations can be definitively determined no matter how detailed or thorough the investigation. It is for this reason that earlier SDTs included in Requirement R4 the ability to declare that no cause could be determine as part of the Misoperation Identification and Correction process. It is also noteworthy to mention that Requirement R4 is the only requirement within this standard that allows such a declaration. Therefore, care will be needed when retiring Requirement R4 to ensure that language is added to the standard to ensure this important ability and right held by TOs, GOs and DPs is not lost. To better understand this concern, EEI suggests that a thorough review of the flowchart (see R4) on Page 36 of PRC-004-5(i) is conducted by the responsible SDT."	
Likes 0	
Dislikes 0	
Response	

Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submitthe quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Please see the redline version of the standard’s flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.

Richard Vine - California ISO - 2

Answer	Yes
Document Name	

Comment
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)

Likes 0	
Dislikes 0	

Response
Please see response to the comments from the ISO/RTO Council Standards Review Committee.

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5

Answer	Yes
Document Name	

Comment
NV Energy agrees that the investigative actions conducted for Misoperations do not directly improve BES reliability, and thus Requirement R4 should be retired. However, Entities are still required to provide quarterly reports to MIDAS on misoperation types and causes, thus investigation is still a necessary part of this Standard. So, to capture this supplemental administrative requirement, NV Energy would recommend the SDT to modify R5 to include a situation where the cause of the Misoperations is unknown, which ais an allowable entry for cause in MIDAS. We don’t think it is clear that the unknown cause can be described in the current language in R5. It is still unclear if an R5 declaration within a CAP that the actions are beyond the entities control can be tied to an "unknown" cause. Given that the R5 "60-day time requirement" starts when the cause is identified, but if the cause is unknown, when does that clock start?. If the

current wording in R5 remains intact, entities can technically stop at R3 for Misoperations that it has not identified a cause. We do not believe that this is the intent of the standard. If this clarity is not provided, there is a potential that when auditing the Requirement, one can determine that a cause must be identified, if there is no clear requirement that allows a cause of "unknown" to be declared.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submit the quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Requirement R5 is out of scope of this project. Please see the redline version of the standard's flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	

Comment	
Avista concurs with EEI comments: "EEI supports the retirement of PRC-004-5(i), Requirement R4; however, we are concerned that simply retiring this requirement could create some unintended negative consequences. As it is well understood, not all misoperations can be definitively determined no matter how detailed or thorough the investigation. It is for this reason that earlier SDTs included in Requirement R4 the ability to declare that no cause could be determined as part of the Misoperation Identification and Correction process. It is also noteworthy to mention that Requirement R4 is the only requirement within this standard that allows such a declaration. Therefore, care will be needed when retiring Requirement R4 to ensure that language is added to the standard to ensure this important ability and right held by TOs, GOs and DPs is not lost. To better understand this concern, EEI suggests that a thorough review of the flowchart (see R4) on Page 36 of PRC-004-5(i) is conducted by the responsible SDT."	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submit the quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Please see the redline version of the standard's flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	

Please see response to the comments from Edison Electric Institute.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Note: ERCOT has not signed on to this SRC joint response, however will provide its own response in a separate submission.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Allie Gavin - Allie Gavin On Behalf of: James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Michael Moltane, International Transmission Company Holdings Corporation, 1; - Allie Gavin	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	

Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Darnez Gresham - Berkshire Hathaway Energy - MidAmerican Energy Co. - 3	
Answer	
Document Name	
Comment	

MEC agrees with the SDT that investigative actions for Misoperations do not improve reliability. Therefore, we are prepared to support the SDT's draft revision to retire R4.

We would also like the drafting team to modify R5 to include a situation where the cause of the Misoperations is unknown. We don't believe it is clear that the unknown cause can be described in the R5 declaration that the CAP is beyond the entities control. The R5 60 day time requirement starts when the cause is identified. How do you start the clock to develop the CAP if the cause is unknown? The R5 declaration is after this time requirement in the standard. If the current wording in R5 remains intact, entities can technically stop at R3 for Misoperations that it has not identified a cause. I do not think this is the intent of the standard.

Another issue is that an auditor can determine that a cause must be identified if there is no clear requirement that allows a cause known declaration. There are some Misoperations (very few) where the Protection Engineer will not be able to determine a cause. The is why MIDAS has a cause unknown option.

See the PRC-004-5i flowchart and how you jump from R3 to R5 if R4 is removed.

Likes 1	Berkshire Hathaway Energy - MidAmerican Energy Co., 1, Harbour Terry
Dislikes 0	
Response	
Thank you for your comments. PRC-004 is subject to a quarterly NERC Rules of Procedure Section 1600 data submittal. All regions submitthe quarterly data to a peer review group, which then has the opportunity to further question the entity if needed. Requirement R5 is out of scope for this project.	
Chris Scanlon - Exelon - 1	
Answer	
Document Name	
Comment	

On behalf of Exelon, Segments 1, 3, 5, 6

- On Page 23 of 32 of the posted, proposed "clean" version of PRC-004-6, the sentence:

"Once a Misoperation is identified in either Requirement R1 or R3, and the applicable entity did not identify the cause(s) of the Misoperation, the time period for performing at least one investigative action every two full calendar quarters begins."

This sentence references the required actions in Requirement R4 of the Standard, which is to be retired. Recommend this sentence be deleted.

- On Page 24 of 32 of the posted, proposed "clean" version of PRC-004-6, in the second to the last paragraph, the phrase "under Requirement R4". Recommend this phrase be deleted.

• On Page 32 of 32 of the posted, proposed "clean" version of PRC-004-6, in the Flowchart, the area of the Flowchart leading into R5, the box labeled "Cause Known?" has only a path into R5. The Standard must still provide the option to end an investigation with no cause found. Recommend: • For a Misoperation with no cause found, the flowchart should also point from "Cause Unknown?" to the "Stop" circle to the left. • Add "Yes" to the existing path from "Cause Unknown?" to R5, and "No" to the new path to "Stop".	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments. The SDT has updated the standard based on comments received. Please see the redline version of the standard's flowchart on the project page that demonstrates how an entity proceeds from R3 to R5.	

NERC
NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

20. ***The SDT is proposing to retire TOP-001-4, Requirements R19 and R22. Do you agree with the SDT's proposal to retire Requirements R19 and R22 of TOP-001-4? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

The SDT received comments indicating concern that if TOP-001-4, Requirements R19 and R22 were retired, Transmission Operators may not put emphasis specifically on having data exchange capabilities with the entities they have identified it needs data from to perform its Operational Planning Analyses and that Balancing Authorities may not put emphasis specifically on having data exchange capabilities with the entities it has identified it needs data from to perform its Operating Plan for next-day operations. The data exchange capabilities that are indicated in TOP-001-4, Requirements R19 and R22 for the Operation Planning Analysis are inherent to Requirement R20 and R23 that actually has a higher Violation Risk Factor and is clearly tied to the Operation Planning Analysis in TOP-003-3 Requirements R1, R2, R3, R4 and R5. The data exchange capabilities are indicated in TOP-003-3, Requirement R1, R2, R3, R4, R5, which includes BAs and TOPs and TOP-002-4, Requirements R1, R2 and R4 to perform the OPA, which makes TOP-001-4 R19 and R22 redundant with the aforementioned standards and requirements. The purpose statement of TOP-003-3 is "To ensure that the Transmission Operator and Balancing Authority have data needed to fulfill their operational and planning responsibilities". The purpose statement of TOP-002-4 is "To ensure that transmission Operators and Balancing Authorities have plans for operating within specified limits" using the data collected per TOP-003-3 and ensure each BA and TOP have plans to operate within specified limits using the data provided in TOP-003-3. The requirements in TOP-001-4 satisfy the obligations of identifying the data required and means for delivering the data for the Operational Planning Analysis Real-time monitoring, and Real-time Assessments. This data exchange is accomplished via a redundant/secure Inter Control Center Communication Protocol (ICCP) that all RC's, BA's TOP's use to exchange the required data.

Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	No
Document Name	
Comment	

Texas RE is concerned that if TOP-001-4 Requirements R19 was eliminated, Transmission Operators may not put emphasis specifically on having data exchange capabilities with the entities they have identified it needs data from to perform its Operational Planning Analyses .

Texas RE is concerned that if TOP-001-4 Requirements R22 was eliminated, Balancing Authorities may not put emphasis specifically on having data exchange capabilities with the entities it has identified it needs data from to perform its Operating Plan for next-day operations .

Likes 0	
Dislikes 0	

Response

Thank you for your comments. The data exchange capabilities that are indicated in TOP-001-4, Requirements R19 and R22 for the Operation Planning Analysis are inherent to Requirement R20 and R23 that actually has a higher Violation Risk Factor and is clearly tied to the Operation Planning Analysis in TOP-003-3 Requirements R1, R2, R3, R4 and R5. The data exchange capabilities are indicated in TOP-003-3, Requirement R1, R2, R3, R4, R5, which includes BAs and TOPs and TOP-002-4, Requirements R1, R2 and R4 to perform the OPA, which makes TOP-001-4 R19 and R22 redundant with the aforementioned standards and requirements. The purpose statement of TOP-003-3 is “To ensure that the Transmission Operator and Balancing Authority have data needed to fulfill their operational and planning responsibilities”. The purpose statement of TOP-002-4 is “To ensure that transmission Operators and Balancing Authorities have plans for operating within specified limits” using the data collected per TOP-003-3 and ensure each BA and TOP have plans to operate within specified limits using the data provided in TOP-003-3. The requirements in TOP-001-4 satisfy the obligations of identifying the data required and means for delivering the data for the Operational Planning Analysis Real-time monitoring, and Real-time Assessments. This data exchange is accomplished via a redundant/secure Inter Control Center Communication Protocol (ICCP) that all RC’s, BA’s TOP’s use to exchange the required data.

Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company

Answer	Yes
Document Name	

Comment

In regard to R19, this requirement is only administrative in nature as an entity must demonstrate that is has the ability exchange data with all entities that it provides and receives information from to perform its monitoring and assessments, to include operational planning before it can be certified to perform the TOP function. In addition, TOP entities are on a 3-year audit cycle and in which the entity's data exchange capabilities with other entities are reviewed. In regard to R22, this requirement is only administrative in nature as an entity must demonstrate that is has the ability exchange data with all entities that it provides and receives information from to perform its monitoring and assessments before it can be certified to perform the BA function. In addition, BA entities are on a 3-year audit cycle in which the entity's data exchange capabilities with other entities are reviewed.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comments.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	

Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
NPCC supports the SDTs position. However, we would consider supporting a position in which these Requirements would be recommended to the phase two analysis, and that they should be incorporated into the entity certification process.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	

Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	

Having data exchange capabilities does not add a reliability benefit. Something must be done with the data in order to impact reliability. The authority to request and do something with the data is adequately covered in TOP-003-3.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anthony Jablonski - ReliabilityFirst - 10	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains	

Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	

Dislikes 0	
Response	
Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

21. ***The SDT is proposing to retire VAR-001-5, Requirement R2. Do you agree with the SDT's proposal to retire Requirement R2 of VAR-001-5? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation*****.**

Summary Response:

The SDT determined Requirement R2 should be retired for the following reasons:

VAR-001-5, Requirement R2 states "Each Transmission Operator shall schedule sufficient reactive resources to regulate voltage levels under normal and Contingency conditions. Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load"

VAR-001-5 R2 contains two sentences, with the first sentence being a requirement and the second being a guidance statement. Each sentence is analyzed separately. The first sentence requires the TOP to schedule sufficient reactive resources to regulate voltage levels under normal and contingency conditions. By using the Operational Planning Assessment as described and required in TOP-002-4 and the criteria described in TOP-001-4, R10 the TOP must use a variety of tools to regulate voltage levels, including reactive control. Using Real-time Contingency Analysis tools allows the TOP to determine specific actions to regulate voltage during contingency conditions. Using Real-time monitoring and making real-time decisions on voltage is duplicative with the existing requirements in the TOP-001-4 and TOP-002-4, which direct the TOP to plan and operate within in SOL values, which includes system voltage limits. TOP-002-4, Requirement R1 requires an OPA to be completed to ensure no SOL is violated, and TOP-001-4, Requirement R10 provides the criteria that the TOP shall use for determining SOL exceedances, which includes monitoring voltages. If an SOL violation is identified, then the TOP shall have an Operating Plan to mitigate the violation. TOP-001-4 and TOP-002-4 requirements direct the TOP to maintain reliability of the BES and to mitigate SOL exceedances. If the TOP identifies no SOLs, voltage or otherwise, then the TOP has enough resources "scheduled" to maintain reliability of its BES. The remaining VAR-001-4.2 requirements ensure that a TOP ensures voltage, reactive flows, and reactive resources are monitored, controlled, and maintained with limits. The FAC family of standards ensure the proper BES Facilities and/or Elements are built with applicable equipment and system ratings.

Specifically,

1. TOP-002-4 - Operations Planning with an effective date of April 1, 2017

   Requirement 1 of this standard requires the TOP to have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its Transmission Operator Area will exceed any of its System Operating Limits (SOLs). Requirement 2 requires the TOP to have an Operating Plan(s) for next-day operations to address potential System Operating Limit (SOL) exceedances identified as a result of its Operational Planning Analysis as required in Requirement R1.

   An Operating Plan is defined by NERC as "*A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes. A company-specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating restoration progress with other entities, etc., is an example of an Operating Plan.*"

   In order to mitigate SOL exceedances, or to address potential SOL exceedances, the TOP must have a variety of tools available to immediately address such condition. One such tool are reactive resources. The TOP MUST have an adequate number of reactive resources to mitigate any potential or actual SOL exceedance. The adequate number is determined through analysis.

2. TOP-001-4 – Transmission Operations with an effective date of July 1, 2018

   Requirement 13 requires each TOP to ensure a Real-time Assessment is performed at least once every 30 minutes and Requirement 14 requires the TOP to initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment.

   This is a requirement that the TOP have an Operating Plan to mitigate SOL exceedances. The same requirement of the TOP exists here as it did under TOP-002-4. The TOP MUST have an adequate number of reactive resources to mitigate SOL exceedances. The adequate number is determined through analysis.

The second sentence of VAR-001-5 R2 states "Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load." As noted by the Enhanced Periodic Review group during its September 2016 meeting and agreed to herein, this language is guidance or a measure and is unnecessary in the requirement. It was suggested then that perhaps this language be moved to a guidance section or document.

Kim Thomas - Duke Energy - 1,3,5,6 - FRCC,SERC,RF, Group Name Duke Energy	
Answer	No

Document Name	
Comment	

Duke Energy disagrees with the drafting team's proposal to retire VAR-001-5 R2. This requirement ensures that Operators have the necessary reactive resources they need to provide voltage control. Eliminating this requirement would take away an Operators ability to justify keeping a reactive resource in service and potentially negatively impact the reliability of the grid.

Likes 0	
Dislikes 0	

Response

Thank you for your comment. The SDT determined Requirement R2 should be retired for the following reasons:

VAR-001-5, Requirement R2 states "Each Transmission Operator shall schedule sufficient reactive resources to regulate voltage levels under normal and Contingency conditions. Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load"

VAR-001-5 R2 contains two sentences, with the first sentence being a requirement and the second being a guidance statement. Each sentence is analyzed separately. The first sentence requires the TOP to schedule sufficient reactive resources to regulate voltage levels under normal and contingency conditions. By using the Operational Planning Assessment as described and required in TOP-002-4 and the criteria described in TOP-001-4, R10 the TOP must use a variety of tools to regulate voltage levels, including reactive control. Using Real-time Contingency Analysis tools allows the TOP to determine specific actions to regulate voltage during contingency conditions. Using Real-time monitoring and making real-time decisions on voltage is duplicative with the existing requirements in the TOP-001-4 and TOP-002-4, which direct the TOP to plan and operate within in SOL values, which includes system voltage limits. TOP-002-4, Requirement R1 requires an OPA to be completed to ensure no SOL is violated, and TOP-001-4, Requirement R10 provides the criteria that the TOP shall use for determining SOL exceedances, which includes monitoring voltages. If an SOL violation is identified, then the TOP shall have an Operating Plan to mitigate the violation. TOP-001-4 and TOP-002-4 requirements direct the TOP to maintain reliability of the BES and to mitigate SOL exceedances. If the TOP identifies no SOLs, voltage or otherwise, then the TOP has enough resources "scheduled" to maintain reliability of its BES. The remaining VAR-001-4.2 requirements ensure that a TOP ensures voltage, reactive flows, and reactive resources are monitored, controlled, and maintained with limits. The FAC family of standards ensure the proper BES Facilities and/or Elements are built with applicable equipment and system ratings.

Specifically,

3. TOP-002-4 - Operations Planning with an effective date of April 1, 2017

   Requirement 1 of this standard requires the TOP to have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its Transmission Operator Area will exceed any of its System Operating Limits (SOLs). Requirement 2 requires the TOP to have an Operating Plan(s) for next-day operations to address potential System Operating Limit (SOL) exceedances identified as a result of its Operational Planning Analysis as required in Requirement R1.

   An Operating Plan is defined by NERC as "*A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes. A company-specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating restoration progress with other entities, etc., is an example of an Operating Plan.*"

   In order to mitigate SOL exceedances, or to address potential SOL exceedances, the TOP must have a variety of tools available to immediately address such condition. One such tool are reactive resources. The TOP MUST have an adequate number of reactive resources to mitigate any potential or actual SOL exceedance. The adequate number is determined through analysis.

4. TOP-001-4 – Transmission Operations with an effective date of July 1, 2018

   Requirement 13 requires each TOP to ensure a Real-time Assessment is performed at least once every 30 minutes and Requirement 14 requires the TOP to initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment.

   This is a requirement that the TOP have an Operating Plan to mitigate SOL exceedances. The same requirement of the TOP exists here as it did under TOP-002-4. The TOP MUST have an adequate number of reactive resources to mitigate SOL exceedances. The adequate number is determined through analysis.

The second sentence of VAR-001-5 R2 states "Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load." As noted by the Enhanced Periodic Review group during its September 2016 meeting and agreed to herein, this language is

guidance or a measure and is unnecessary in the requirement. It was suggested then that perhaps this language be moved to a guidance section or document.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	No
Document Name	
Comment	
Idaho Power disagrees with the proposed retirement for VAR-001-5 R5 because, while it is difficult to provide evidence for, the requirement for scheduling sufficient reactive resources is important.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT determined Requirement R2 should be retired for the following reasons: VAR-001-5, Requirement R2 states "Each Transmission Operator shall schedule sufficient reactive resources to regulate voltage levels under normal and Contingency conditions. Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load" VAR-001-5 R2 contains two sentences, with the first sentence being a requirement and the second being a guidance statement. Each sentence is analyzed separately. The first sentence requires the TOP to schedule sufficient reactive resources to regulate voltage levels under normal and contingency conditions. By using the Operational Planning Assessment as described and required in TOP-002-4 and the criteria described in TOP-001-4, R10 the TOP must use a variety of tools to regulate voltage levels, including reactive control. Using Real-time Contingency Analysis tools allows the TOP to determine specific actions to regulate voltage during contingency conditions. Using Real-time monitoring and making real-time decisions on voltage is duplicative with the existing requirements in the TOP-001-4 and TOP-002-4, which direct the TOP to plan and operate within in SOL values, which includes system voltage limits. TOP-002-4, Requirement R1 requires an OPA to be completed to ensure no SOL is violated, and TOP-001-4, Requirement R10 provides the criteria that the TOP shall	

use for determining SOL exceedances, which includes monitoring voltages. If an SOL violation is identified, then the TOP shall have an Operating Plan to mitigate the violation. TOP-001-4 and TOP-002-4 requirements direct the TOP to maintain reliability of the BES and to mitigate SOL exceedances. If the TOP identifies no SOLs, voltage or otherwise, then the TOP has enough resources "scheduled" to maintain reliability of its BES. The remaining VAR-001-4.2 requirements ensure that a TOP ensures voltage, reactive flows, and reactive resources are monitored, controlled, and maintained with limits. The FAC family of standards ensure the proper BES Facilities and/or Elements are built with applicable equipment and system ratings.

Specifically,

5. TOP-002-4 - Operations Planning with an effective date of April 1, 2017

   Requirement 1 of this standard requires the TOP to have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its Transmission Operator Area will exceed any of its System Operating Limits (SOLs). Requirement 2 requires the TOP to have an Operating Plan(s) for next-day operations to address potential System Operating Limit (SOL) exceedances identified as a result of its Operational Planning Analysis as required in Requirement R1.

   An Operating Plan is defined by NERC as *"A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes. A company-specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating restoration progress with other entities, etc., is an example of an Operating Plan."*

   In order to mitigate SOL exceedances, or to address potential SOL exceedances, the TOP must have a variety of tools available to immediately address such condition. One such tool are reactive resources. The TOP MUST have an adequate number of reactive resources to mitigate any potential or actual SOL exceedance. The adequate number is determined through analysis.

6. TOP-001-4 – Transmission Operations with an effective date of July 1, 2018

   Requirement 13 requires each TOP to ensure a Real-time Assessment is performed at least once every 30 minutes and Requirement 14 requires the TOP to initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment.

   This is a requirement that the TOP have an Operating Plan to mitigate SOL exceedances. The same requirement of the TOP exists here as it did under TOP-002-4. The TOP MUST have an adequate number of reactive resources to mitigate SOL exceedances. The adequate number is determined through analysis.

The second sentence of VAR-001-5 R2 states “Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load.” As noted by the Enhanced Periodic Review group during its September 2016 meeting and agreed to herein, this language is guidance or a measure and is unnecessary in the requirement. It was suggested then that perhaps this language be moved to a guidance section or document.

Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
No comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Richard Vine - California ISO - 2	
Answer	Yes
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	

Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	Yes
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to comments submitted by Edison Electric Institute.	
Marsha Morgan - Southern Company - Southern Company Services, Inc. - 1,3,5,6 - SERC, Group Name Southern Company	
Answer	Yes

Document Name	
Comment	
Ensuring that an entity has sufficient reactive resources to regulate voltage levels under both normal and contingency conditions is an inherent function of the TOP, and although having a standard requirement may add some reinforcement, it does not necessarily add to reliability. If the TOP fails to provide adequate reactive resources to regulate voltage, it could lead to voltage collapse, damage to equipment, system overloads and blackouts. (All of which are covered in other NERC Reliability Standards). Having this standard requirement in place places an administrative burden on the TOP and takes their time away from operating the transmission system.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2	
Answer	Yes
Document Name	
Comment	
ERCOT is not opposed to the retirement of this requirement.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Marty Hostler - Northern California Power Agency - 5	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Maryanne Darling-Reich - Black Hills Corporation - 1,3,5,6 - WECC	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Karie Barczak - DTE Energy - Detroit Edison Company - 3, Group Name DTE Energy - DTE Electric	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kelsi Rigby - APS - Arizona Public Service Co. - 5	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Glen Farmer - Avista - Avista Corporation - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Chris Wagner - Santee Cooper - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Preston Walker - PJM Interconnection, L.L.C. - 2 - SERC,RF	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Sing Tay - OGE Energy - Oklahoma Gas and Electric Co. - 6, Group Name OKGE	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Julie Hall - Entergy - 6, Group Name Entergy	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LeRoy Patterson - Public Utility District No. 2 of Grant County, Washington - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Ruida Shu - Northeast Power Coordinating Council - 1,2,3,4,5,6,7,8,9,10 - NPCC, Group Name RSC no Dominion, Con-Edison	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	

Mark Holman - PJM Interconnection, L.L.C. - 2	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Val Ridad - Silicon Valley Power - City of Santa Clara - 3,4,5	
Answer	Yes
Document Name	
Comment	

Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brian Millard - Tennessee Valley Authority - 1,3,5,6 - SERC, Group Name Tennessee Valley Authority	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Anton Vu - Los Angeles Department of Water and Power - 6	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Daniela Hammons - CenterPoint Energy Houston Electric, LLC - 1	

Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Quintin Lee - Eversource Energy - 1, Group Name Eversource Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jim Williams - Southwest Power Pool, Inc. (RTO) - 2 - MRO,WECC, Group Name SPP Standards Review Group	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
LaTroy Brumfield - American Transmission Company, LLC - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	

Thank you for your support.	
Mike Magruder - Avista - Avista Corporation - 1	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Brandon McCormick - Brandon McCormick On Behalf of: Carol Chinn, Florida Municipal Power Agency, 6, 4, 3, 5; Chris Gowder, Florida Municipal Power Agency, 6, 4, 3, 5; David Owens, Gainesville Regional Utilities, 1, 5, 3; Joe McKinney, Florida Municipal Power Agency, 6, 4, 3, 5; Neville Bowen, Ocala Utility Services, 3; Richard Montgomery, Florida Municipal Power Agency, 6, 4, 3, 5; Tom Reedy, Florida Municipal Power Pool, 6; - Brandon McCormick	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jesus Sammy Alcaraz - Imperial Irrigation District - 1	
Answer	Yes

Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Mike Smith - Manitoba Hydro - 1, Group Name Manitoba Hydro	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Constantin Chitescu - Ontario Power Generation Inc. - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	

Response	
Thank you for your support.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Gregory Campoli - New York Independent System Operator - 2, Group Name ISO/RTO Standards Review Committee	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	Yes
Document Name	

Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Thomas Foltz - AEP - 5	
Answer	Yes
Document Name	
Comment	
Likes 0	
Dislikes 0	
Response	
Thank you for your support.	
Jamie Monette - Allete - Minnesota Power, Inc. - 1	
Answer	
Document Name	
Comment	
This was not reviewed.	
Likes 0	
Dislikes 0	

Response	
Thank you for your comment.	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE is concerned that without VAR-001-5 Requirement R2, Transmission Operators may not put emphasis on scheduling sufficient reactive resources to regulate voltage levels. This could lead to voltage collapse. Additionally, the SDT is relying on the fact that voltage limit is a form of an SOL. Since there is no definition of SOL exceedance, entities may not adequately address voltage issues within the OPA, whereas this requirement emphasizes regulating voltage levels. Texas RE recommends removing the reference to "Compliance Monitor" in C1.2 Data Retention. Compliance Monitor is an outdated term and there is no definition for it.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment. The SDT determined Requirement R2 should be retired for the following reasons: VAR-001-5, Requirement R2 states "Each Transmission Operator shall schedule sufficient reactive resources to regulate voltage levels under normal and Contingency conditions. Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load" VAR-001-5 R2 contains two sentences, with the first sentence being a requirement and the second being a guidance statement. Each sentence is analyzed separately. The first sentence requires the TOP to schedule sufficient reactive resources to regulate voltage levels under normal and contingency conditions. By using the Operational Planning Assessment as described and required in TOP-002-4 and the	

criteria described in TOP-001-4, R10 the TOP must use a variety of tools to regulate voltage levels, including reactive control. Using Real-time Contingency Analysis tools allows the TOP to determine specific actions to regulate voltage during contingency conditions. Using Real-time monitoring and making real-time decisions on voltage is duplicative with the existing requirements in the TOP-001-4 and TOP-002-4, which direct the TOP to plan and operate within in SOL values, which includes system voltage limits. TOP-002-4, Requirement R1 requires an OPA to be completed to ensure no SOL is violated, and TOP-001-4, Requirement R10 provides the criteria that the TOP shall use for determining SOL exceedances, which includes monitoring voltages. If an SOL violation is identified, then the TOP shall have an Operating Plan to mitigate the violation. TOP-001-4 and TOP-002-4 requirements direct the TOP to maintain reliability of the BES and to mitigate SOL exceedances. If the TOP identifies no SOLs, voltage or otherwise, then the TOP has enough resources "scheduled" to maintain reliability of its BES. The remaining VAR-001-4.2 requirements ensure that a TOP ensures voltage, reactive flows, and reactive resources are monitored, controlled, and maintained with limits. The FAC family of standards ensure the proper BES Facilities and/or Elements are built with applicable equipment and system ratings.

Specifically,

7. TOP-002-4 - Operations Planning with an effective date of April 1, 2017

   Requirement 1 of this standard requires the TOP to have an Operational Planning Analysis that will allow it to assess whether its planned operations for the next day within its Transmission Operator Area will exceed any of its System Operating Limits (SOLs). Requirement 2 requires the TOP to have an Operating Plan(s) for next-day operations to address potential System Operating Limit (SOL) exceedances identified as a result of its Operational Planning Analysis as required in Requirement R1.

   An Operating Plan is defined by NERC as "*A document that identifies a group of activities that may be used to achieve some goal. An Operating Plan may contain Operating Procedures and Operating Processes. A company-specific system restoration plan that includes an Operating Procedure for black-starting units, Operating Processes for communicating restoration progress with other entities, etc., is an example of an Operating Plan.*"

   In order to mitigate SOL exceedances, or to address potential SOL exceedances, the TOP must have a variety of tools available to immediately address such condition. One such tool are reactive resources. The TOP MUST have an adequate number of reactive resources to mitigate any potential or actual SOL exceedance. The adequate number is determined through analysis.

8. TOP-001-4 – Transmission Operations with an effective date of July 1, 2018

Requirement 13 requires each TOP to ensure a Real-time Assessment is performed at least once every 30 minutes and Requirement 14 requires the TOP to initiate its Operating Plan to mitigate a SOL exceedance identified as part of its Real-time monitoring or Real-time Assessment.

This is a requirement that the TOP have an Operating Plan to mitigate SOL exceedances. The same requirement of the TOP exists here as it did under TOP-002-4. The TOP MUST have an adequate number of reactive resources to mitigate SOL exceedances. The adequate number is determined through analysis.

The second sentence of VAR-001-5 R2 states "Transmission Operators can provide sufficient reactive resources through various means including, but not limited to, reactive generation scheduling, transmission line and reactive resource switching, and using controllable load." As noted by the Enhanced Periodic Review group during its September 2016 meeting and agreed to herein, this language is guidance or a measure and is unnecessary in the requirement. It was suggested then that perhaps this language be moved to a guidance section or document.

22. ***Please provide any additional comments for the SDT to consider that have not already been provided in the questions above*****.**

Summary Response:

MOD: Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

SER Phase II: The SER Phase II effort can also be followed on the Standards Efficiency Review Project Page.

Jodirah Green - ACES Power Marketing - 1,3,4,5,6 - MRO,WECC,Texas RE,SERC,RF, Group Name ACES Standard Collaborations	
Answer	
Document Name	
Comment	

Although ACES agrees with the retirement Standards MOD-001-1a, MOD-004-1, MOD-008-1, MOD-030-3 and MOD-001-2, ACES cautions the unique position of some of its members requiring them to obtain transmission service across multiple BAAs and participate in transactions between ISO/RTO and non-ISO/RTO entities. This has allowed those entities to witness first-hand the mismatched ATC values across the seams shared by adjacent Transmission Providers. For that reason, we advocated for this at that time and still hold the position that the retirement of these standards should be contingent upon analysis of their retirement impact on entities with such unique situations, like North Carolina Electric Membership Corporation (NCEMC) that depends on the transmission services to meet its load obligation, reliably and economically, within each of their BAAs.

Thank you for the opportunity to comment.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. Available Transfer Capability (ATC)/Available Flowgate Capability (AFC), as well as eTags, are commercially-focused elements, facilitating interchange and balancing of interchange. The Real-time system operators are ambivalent of these commercial arrangements, as they must maintain reliability of the BES according to System Operating Limits (SOLs) and Interconnection Reliability Operating Limits (IROLs). If a scheduled interchange would violate SOLs or IROLs, the Real-time operators must disregard the scheduled interchange and operate the system to its actual reliability limits. This observation is reinforced by NERC's statement in the 2015 filing related to risk-based reliability proposing removal of the Interchange Authority from the compliance registry, where it's stated: "NERC proposes to remove interchange authorities as functional entities, explaining that the activities of the interchange authority are commercial in nature and, thus, the removal will have little if any impact on reliability of the bulk electric system." FERC acknowledged this in their March 15, 2015 Order, where they stated: "…we approve NERC's proposed removal of the interchange authority as a functional entity. As explained by NERC, the interchange authority performs a commercial function, essentially quality control activity in verifying and communicating interchange schedules."

MOD-001-2:

Requirement R1: TOPs are not required to determine TFC or TTC; therefore, this is a conditional obligation - and there is no requirement that TOPs coordinate their methodologies. The definition of AFC explicitly includes the term "…further commercial activity…" which is explicit that this relates to commercial activity, not reliability-related activity. This requirement also has no performance elements, so there is nothing to measure against.

Requirement R1, Requirement Parts 1.1.1 thru 1.1.4 are expressly the definition of SOLs and are duplicative of the definition. Requirement Part 1.1.5 therefore adds nothing, as there is no provision for "Other SOLs."

Requirement R1, Requirement Part 1.2.2 are Additions and retirements are Long-term planning related and would be reflected in operational models. Planned outages for the operating time horizon is expressly addressed in TOP-001-4 R9.

Requirement R1, Part 1.3: any reliability-related constraints are already expressed in OPAs and the requirements to operate within SOLs.

Requirement R1, Requirement Part 1.3.1: generation to load transfers does not, in most cases, reflect any physical arrangement. Such transfers assume a system between the two that can handle the transfer; and this system must be operated to respect SOLs.

The SDT determined that Requirement R1, Requirement Part 1.3.2 is ambiguous. There are several distribution factors; one related to outages, one related to transfers, and one related to a composite between the two. It is ambiguous to which of these distribution factors is being addressed.

Requirement R2: applies to TSP and Available Flowgate Capacity or Available Transfer Capability. Requirement R1 applies to TOP and Total Flowgate Capacity or Total Transfer Capacity. Otherwise, Requirement R2 is very similar to Requirement R1, and the rationale to retire Requirement R1 also applies to Requirement R2.

Requirement R3: CBM is defined as “The amount of firm transmission transfer capability preserved by the transmission provider for Load-Serving Entities (LSEs) whose loads are located on that Transmission Service Provider’s system to enable access by the LSEs to generation from interconnected systems to meet generation reliability requirements. Preservation of CBM for an LSE allows that entity to reduce its installed generating capacity below that which may otherwise have been necessary without interconnections to meet its generation reliability requirements. The transmission transfer capability preserved as CBM is intended to be used by the LSE only in times of emergency generation deficiencies.”

There is no obligation for a TSP to determine CBM; this requirement just applies to TSPs that elect to determine CBM. The requirement contains no criteria regarding what the CBMID must include, rather that generally describing the method.

Further, this requirement has no performance obligation, but to just to have a document; therefore, is administrative.

Requirement R4: The SDT vetted Requirement R4 and determined that Requirement R4 does not require TOPs to determine TRM and establish measurable criteria for what the TRMID must include. Further, R4 does not establish any criteria for the TRMID, just that the

TOP that has TRM must have a document describing its methodology. Therefore, this requirement is simply administrative on an open-ended conditional duty.

Requirement R5 and its Requirement Parts:
Requirement Part 5.1: as the TOP or TSP is not required to have a TFC or TTC methodology, or an ATCID, CBMID, or TRMID, other entities that may have a reliability-related need for these, that information is routinely pursuant to the data specifications of the RC (in INT-010-2.1) and the TOP (in TOP-003-3). In Real-time operation of the BES, the limitations related to similar issues is fully addressed by the obligations of TOP-001-4; specifically as related to operating within SOLs and IROLs and issuing and responding to Operating Instructions.

Requirement Part 5.2 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement Part 5.3 and subparts: OASIS is a mechanism to assure that all market participants have simultaneous access to all market-data, such that no participant has an advantage. To provide this information to any participant via any mechanism rather that OASIS or a publicly-accessible company website becomes a FERC SOC violation.

Requirement R6: If this data had a reliability-related need, it would be addressed via the data specifications in INT-010-2.1 (for RC) and TOP-003-3 (for TOP). However, AFC, ATC, TFC, and TTC are not mandatory to establish; thus the party requested for this data may very well not have the data to provide. Further, various TOPs or TSPs that would have these elements are not required to coordinate them, which could easily lead to widely disparate methodologies. Finally, as market-related data, this data would likely be subject to FERC Standards of Conduct, which would require that the data be publicly posted for all other market participants to access.

Brandon Gleason - Electric Reliability Council of Texas, Inc. - 2

Answer	
Document Name	

Comment

None.

Likes 0	
Dislikes 0	
Response	
Rachel Coyne - Texas Reliability Entity, Inc. - 10	
Answer	
Document Name	
Comment	
Texas RE does not have additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Mark Gray - Edison Electric Institute - NA - Not Applicable - NA - Not Applicable	
Answer	
Document Name	
Comment	
EEI member companies would like to note our appreciation to NERC for the opportunity afforded to the Industry to provide input into the planned SER Phase I Retirements (Project 2018-03). We are very supportive of those efforts as well as the deferments of some requirements to the SER Phase 2 Project. While we understand that the CIP Standards will also be addressed in the SER Phase 2 Project, we ask that NERC provide additional clarity to the Industry as to how and when these Phase 2 efforts will all tie together. Such an effort would be appreciated by the Industry and would resolve any concerns companies may have related to the Phase 2 effort.	

Additionally, EEI Members have noted that when NERC originally queried the Industry for recommendations for possible Reliability Standard Requirements that merit consideration for the Phase 1 effort, the Industry was also told that the CIP Standards would not be considered until the Phase 2 effort. Now that Phase 2 is beginning, EEI looks forward to NERC "consult[ing] with the SER Advisory Group and stakeholders, on a plan to address the CIP Standards in the SER." (see NERC Standards Efficiency Review Project Update | August 3, 2018) We additionally ask NERC to provide greater clarity and detail as to when stakeholder outreach, similar to the Phase 1 Industry solicitation, will be initiated for CIP Reliability Standards? While NERC did receive a small number of CIP related suggestions within the Phase 1 solicitation, the focus was on the O&P Standards. EEI member companies believe additional solicitation focused on CIP is necessary for effectively addressing CIP Standards in Phase 2.	
Likes 0	
Dislikes 0	
Response	
Thank you for your support of the SER Phase I effort. Your comments regarding SER Phase II effort and CIP standards will be forwarded to the appropriate NERC staff leading that effort. The SER Phase II effort can also be followed on the [Standards Efficiency Review Project Page]().	
Kenya Streeter - Edison International - Southern California Edison Company - 6	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute.	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	
LaTroy Brumfield - American Transmission Company, LLC - 1	

Answer	
Document Name	
Comment	

At the onset of the Standards Efficiency Review Project NERC stated that there would be an effort to review/revise the CIP standards during phase 2 of the project. The perception by industry was that the CIP standards would go through an iteration of review/revision like the process used by NERC for the O&P standards during phase 1. Can NERC please clarify whether the CIP standards will be more closely reviewed/revised and vetted by industry in subsequent phase of this project.

Likes 0	
Dislikes 0	

Response

Thank you for your comments. NERC recently developed concepts for the SER Phase II effort that include a CIP Standards Efficiency Review, and solicited industry comments through March 22, 2019. Your comments regarding the SER Phase II effort and CIP standards will be forwarded to the appropriate NERC staff leading that effort. The SER Phase II effort can also be followed on the Standards Efficiency Review Project Page.

Douglas Webb - Douglas Webb On Behalf of: Allen Klassen, Westar Energy, 6, 3, 1, 5; Bryan Taggart, Westar Energy, 6, 3, 1, 5; Derek Brown, Westar Energy, 6, 3, 1, 5; Grant Wilkerson, Westar Energy, 6, 3, 1, 5; James McBee, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Jennifer Flandermeyer, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; John Carlson, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; Marcus Moor, Great Plains Energy - Kansas City Power and Light Co., 1, 3, 6, 5; - Douglas Webb, Group Name Westar-KCPL

Answer	
Document Name	
Comment	

Westar and Kansas City Power & Light Co. support Edison Electric Institute’s comments to Question 22.

Likes 0	

Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute in Question 22.	
Aaron Cavanaugh - Bonneville Power Administration - 1,3,5,6 - WECC	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Please see responses to comments from Edison Electric Institute in Question 22.	
Laura Nelson - IDACORP - Idaho Power Company - 1	
Answer	
Document Name	
Comment	
Idaho Power has no additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	

Romel Aquino - Edison International - Southern California Edison Company - 3	
Answer	
Document Name	
Comment	
Please refer to comments submitted by Edison Electric Institute	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from Edison Electric Institute.	

Kevin Salsbury - Berkshire Hathaway - NV Energy - 5	
Answer	
Document Name	
Comment	
NV Energy is appreciative of the efforts taken by NERC and SDT to review the reliability standards and identify these requirements and standards for retirement. As the efforts with Phase I were dedicated to the O&P Standards, NV Energy is anticipating that in Phase II that this same in-depth review will be conducted for the CIP Standards and Requirements. NV Energy is also looking forward to the inventory of requirements that will be identified with the application of the concepts for the Phase II review.	
Likes 0	
Dislikes 0	
Response	

Thank you for your support of the SER Phase I effort. Your comments regarding SER Phase II effort and CIP standards will be forwarded to the appropriate NERC staff leading that effort. The SER Phase II effort can also be followed on the Standards Efficiency Review Project Page	
Richard Vine - California ISO - 2	
Answer	
Document Name	
Comment	
The California ISO supports the comments of the ISO/RTO Council Standards Review Committee (SRC)	
Likes 0	
Dislikes 0	
Response	
Please see response to the comments from the ISO/RTO Council Standards Review Committee.	
Wendy Center - U.S. Bureau of Reclamation - 5	
Answer	
Document Name	
Comment	
None.	
Likes 0	
Dislikes 0	
Response	
Neil Swearingen - Salt River Project - 1,3,5,6 - WECC	

Answer	
Document Name	
Comment	
No additional comments.	
Likes 0	
Dislikes 0	
Response	
Thank you for your comment.	
Keith Jonassen - Keith Jonassen On Behalf of: Michael Puscas, ISO New England, Inc., 2; - Keith Jonassen	
Answer	
Document Name	
Comment	
None	
Likes 0	
Dislikes 0	
Response	
Marty Hostler - Northern California Power Agency - 5	
Answer	
Document Name	
Comment	

None.	
Likes 0	
Dislikes 0	
Response	

Additional comments submitted by Duke Energy

Duke Energy Comment Response to Question 11: for 2018-03 Standards Efficiency Review Retirements comment period ending on: 4/12/2019 8:00 PM

Question:

11. The SDT is proposing to retire MOD-004-1, Requirements R1, R2, R3, R4, R5, R6, R7, R8, R9, R10, R11, and R12 (all). Do you agree with the SDT's proposal to retire MOD-004-1? If you do not agree, please provide comments. Or, if you agree but have comments or suggestions on the SDT's proposal, please provide your explanation.

☐ Yes

☒ No

Comments:

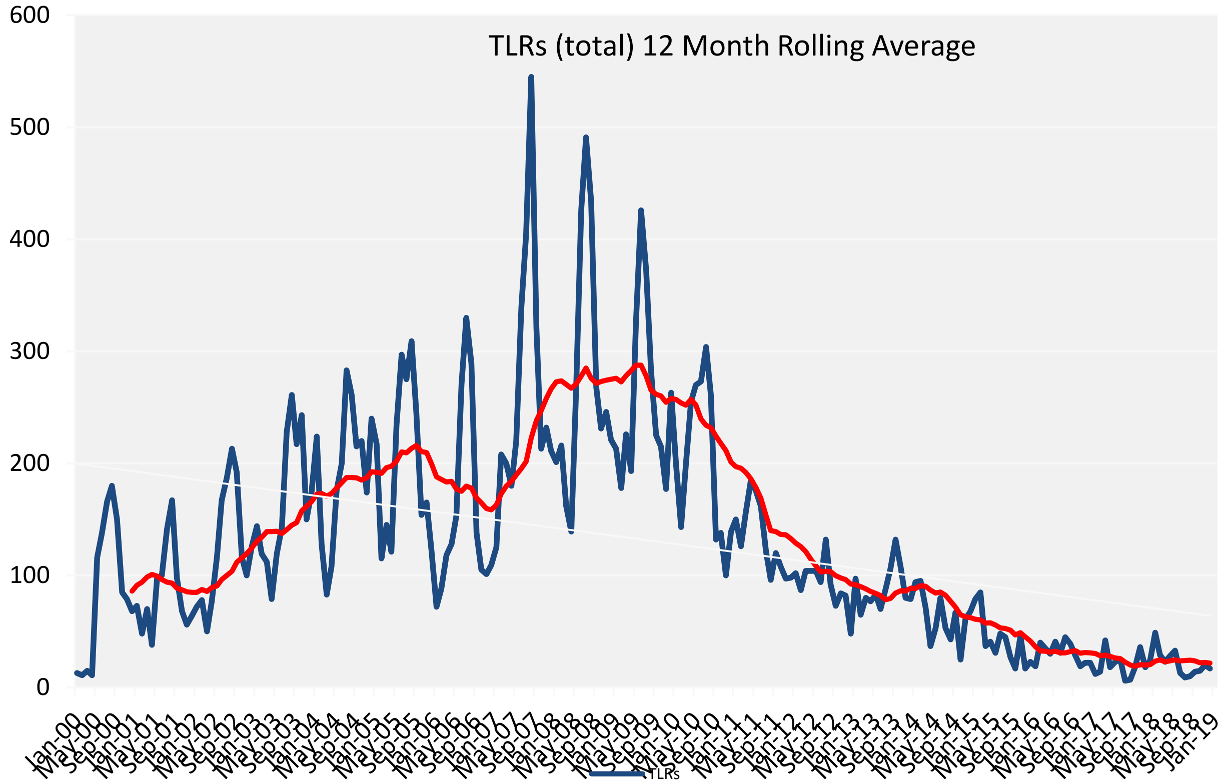
While Duke Energy would support the retirement of these MOD standards, we cannot do so if MOD-001-2 is withdrawn. The MOD standards promote reliability of the grid by putting in place common boundaries and provisions that are necessary for various calculations that need to be performed. These calculations are important to reliability by providing the baseline for understanding the operational need. By retiring the MOD standards, and not having MOD-001-2 in place, there will not be provisions in place to aid an entity in calculating transfer capability. There will not be any boundaries in place for the curtailment of service. We disagree with the commercial based focus that the drafting team took in the technical rationale document. While these MOD standards (and ATC calculation) may have some commercial based elements to them, they also put in place valuable boundaries that help promote consistency in how the industry calculates these values. Removing these boundaries does not promote reliability for the Bulk Electric System and introduces additional burden to the real-time System Operator.

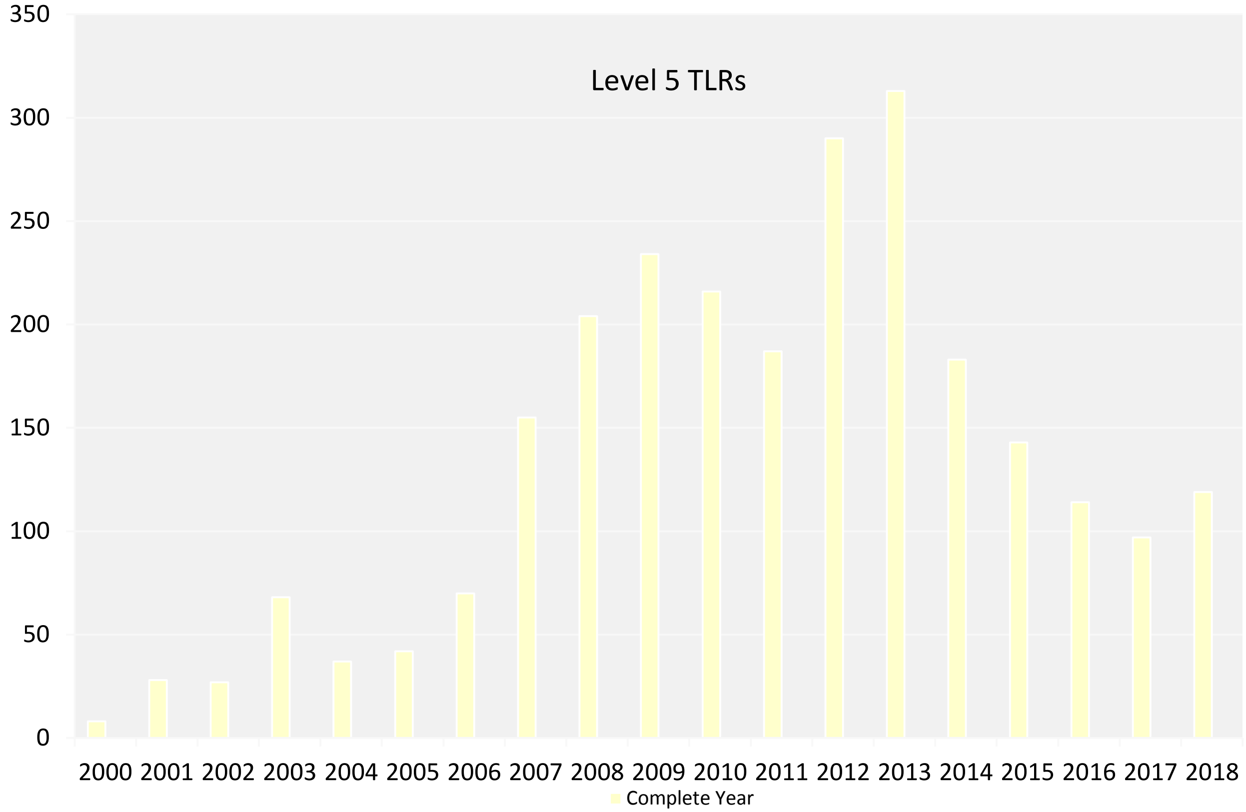
The expectation of the System Operators to ensure the reliability of the BES in the real-time when there have been no requirements to ensure how ATC is calculated or coordinated beyond what is required by NAESB is unrealistic. Some of the most glaring issues with relying solely upon NAESB to regulate the calculation of ATC are: FERC does not have oversight for non-jurisdictional TSPs and therefore cannot require them to incorporate NAESB standards. Also, while NAESB has acted on the recommendations of the MOD-A project to incorporate any of the gaps created by the retirement of MOD-001-1a, MOD-004-1, MOD-008-1, MOD-028-2, MOD-029-2a, MOD-030-3 and adoption of MOD-001-2, FERC has not acted on either the NERC or NAESB filings. Further, NAESB has not been requested to modify proposed standards to incorporate any of the gaps created by the retirement of the proposed MOD-001-2.

Additionally, the lack of any NERC regulation for consistent ATC methodologies and requirements for sharing of data and could potentially lead to an increase of TLRs being called as this would be the only tool System Operators could utilize to combat rampant loop flow impacts on the BES. This could very well lead to capacity concerns and load shedding as the increase in TLRs could include firm curtailments causing capacity shortages. Without mandatory ATC standards, a TSP would be able to sell as much service as possible. The overselling of service and the overscheduling of ATC Paths will lead to an increase of FIRM TLR, potentially forcing Transmission Operators and Load Serving Entities to shed FIRM load to comply with the TLR. Over the past eight years the MOD-001, 28,29, & 30 standards have been effective the industry has seen a dramatic reduction in FIRM TLRs.

Included in the Attachment with Duke Energy’s response to this question is the rolling 12-month average of TLRs from the NERC website. Notice the reduction in TLRs from 2008-2011 when the MOD standards were first published (in 2008 when TSP started to incorporate the MOD standards into their ATC methodologies) and 2011 (when the MOD standards were mandatory and enforceable).

NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION





Additional comments submitted by ReliabilityFirst

ReliabilityFirst does not agree with the removal of PRC-004-6 Requirement R4 for the following reason:

1. The concept of a declaration for no identifiable cause is currently introduced in R4 and in the Application Guidelines (now called Supplemental Material) for R4. The one statement from the Application Guidelines for R4 in version 5(i) states,

a. 'The entity's investigation is complete when it identifies the cause of the Misoperation or makes a declaration that no cause was determined. The declaration is intended to be used if the entity determines that investigative actions have been exhausted or have not provided direction for identifying the Misoperation cause. Historically, approximately 12% of Misoperations are unknown or unexplainable.'

This statement needs to be retained somewhere as an explanation for this use of the declaration. The declaration is also referenced in R5, but for a different reason (problem found but CAP won't improve reliability of BES). The declaration associated with R4 would be a cause that is 'unknown/unexplainable' and all testing and analysis comes up empty. There wouldn't be a CAP, since nothing was found broken, and the declaration is used to close the investigation. In MIDAS, the CAP Completion Status would be 'declaration' rather than improperly coding as 'CAP – Complete', since no CAP was developed.

As far as the administrative requirement of 'corrective action at least once every two calendar quarters', ReliabilityFirst recommends the following for consideration:

R4:
Each Transmission Owner, Generator Owner, and Distribution Provider that has not determined the cause(s) of a Misoperation, for a Misoperation identified in accordance with Requirement R1 or R3, shall perform investigative action(s) to determine the cause(s) of the Misoperation ~~at least once every two full calendar quarters after the Misoperation was first identified~~, maintaining documentation in sufficient detail to provide clear delineation of the stage and findings of the investigation until one of the following completes the investigation: *[Violation Risk Factor: High] [Time Horizon: Operations Assessment, Operations Planning]*

☐The identification of the cause(s) of the Misoperation; or

☐A declaration that no cause was identified.

End of Report