

## Consideration of Comments on Initial Ballot — FAC Order 729 (Project 2010-10)

**Date of Initial Ballot: October 20 – November 3, 2010**

**Summary Consideration:** An initial ballot was conducted from October 20-November 3 and achieved a quorum of 89% and a weighted segment approval of 40%. There were many comments submitted with both affirmative and negative ballots.

The majority of the negative comments questioned the relationship between Planning Transfer Capability (PTC), Available Transfer Capability (ATC), Total Transfer Capability (TTC) and System Operating Limits (SOLs). They indicated a need for clarity as to whether PTC was intended to be analogous with TTC or an ATC for the long term and if PTC was simultaneous or non-simultaneous. The PTC definition was deleted based on industry comments. The standard was revised and no longer focuses on developing PTCs, the focus is on assessing transfer capability in the Near-Term Planning Horizon. This clarification should avoid confusion and draw a distinction from the calculations of ATC/AFC/TTC performed in the operating horizon. The standard's purpose was revised to clarify that the standard focuses on assessment of future reliability and facilities that may be impacted by changes in transfers, not specific transfer capability values. The revised standard allows the Planning Coordinator to determine the Transfer Capability assessment methodology and PTC can be simultaneous or non-simultaneous.

Several negative comments indicated that Requirement R1 Part 1.4 was vague and needed additional clarity. The SDT revised this to require (under new Requirement R1 Part 1.3) that the assumptions and criteria used to perform the assessment be consistent with the Planning Coordinator's planning practices because the purpose of the standard is to support planning for reliable system operation in the planning horizon.

Many of the negative comments indicated that the scope of the standard was unclear because it did not specify which entities, lines or paths it applies to. The SDT revised the purpose of the standard to support Planning Coordinators having a method for analysis of the ability to transfer energy (beyond 13 months) to identify potential future weaknesses and limiting facilities. The standard allows each Planning Coordinator to determine the method (transfer level, paths, contingencies,...) that best allows them to identify potential future weaknesses and limiting facilities according to their understanding of the needs of the system.

Some of the negative comments indicated a need for a clearer rationale for having yet another transfer capability value and indicated that SOLs and IROLs already lead to enough confusion. The comments indicated that SOL studies were adequate to define transfer capabilities. The revised standard clearly requires a transfer capability assessment for one year in the Near-Term Planning Horizon. This clarification should avoid confusion and draw a distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's revised emphasis is on a transfer capability assessment of future reliability and facilities that may be impacted by changes in transfers, not specific transfer capability values nor defining SOLs. The SDT believes there is a reliability related need for this assessment to be conducted.

A few of the negative comments indicated that the additional requirements included in the new FAC-013-2 standard when compared to the FAC-012-1 did not add much value in terms of increased reliability. In addition, they indicated that Requirement R1, Part 1.4 (A statement that the assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon) was of questionable merit and that each Planning Coordinator should decide what criteria and assumptions are used in the planning horizon vs. the operating horizon without a requirement that the planning horizon is always as, or more, limiting. This draft standard (FAC-013-2) merges the planning requirements in FAC-012-1 and FAC-013-1. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers. The SDT believes there is a reliability related need for this assessment to be conducted. The SDT does not believe the TPL standards adequately cover the need at this time. Coordination of planning assessments is important to effective planning for future reliable system performance and meets a reliability related need in accordance with the results-based philosophy. The SDT agreed with

the comment concerning Requirement R1 Part 1.4 (now Requirement R1, Part 1.3) and modified the standard to require that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices.

A couple of the negative comments indicated that the Planning Transfer Capability idea should be retired since it does not have any benefits for BES reliability, and would cause additional burden and confusion for Planning Coordinators. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers. The SDT believes there is a reliability related need for this assessment to be conducted and the SDT did not believe the TPL standards adequately cover the need at this time.

If you feel that the drafting team overlooked your comments, please let us know immediately. Our goal is to give every comment serious consideration in this process. If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, Herb Schrayshuen, at 609-452-8060 or at [herb.schrayshuen@nerc.net](mailto:herb.schrayshuen@nerc.net). In addition, there is a NERC Reliability Standards Appeals Process.<sup>1</sup>

Voter	Entity	Segment	Vote	Comment
Kirit S. Shah	Ameren Services	1	Negative	(1) While the present standard includes a note in the box indicating that PTC is not a starting point for ATC, our undersatnding ia that the box would not be included in the final version of the stanadrd. In that case, some one may try to interprete a relation between ATC and PTC. (2) The stanadrd should require PC to develop PTCMD in coordination with TP in their area or have TP develop PTCMD for its area. (3) Would PTC be simultaneous or non-simultaneous or both?
Jennifer Richardson	Ameren Energy Marketing Co.	6		
<p><b>Response:</b> The language from the text box was revised and moved into the Purpose statement and the text box has been removed. The PTC definition and the definition of TPCMD have been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard does not specify "how" to develop a Transfer Capability methodology – and does not preclude Planning Coordinators from working with other planning entities to develop this methodology. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The assessment methodology will be determined by the PC and could be simultaneous or non-simultaneous.</p>				
Gordon Rawlings	BC Transmission Corporation	1	Negative	The SDT is to be commended for their efforts to respond to FERC directions and input from NERC members to combine the standards FAC-012 and FAC-013 in to a single document to cover transfer capabilities in the planning horizon. However, BC Hydro is voting no on this ballot. Based on existing standards BC Hydro has already established transfer capability and SOL methodologies for both the operating and planning horizons under the existing FAC-010 - 013 standards. We believe there is no value added in the creation of new terminology and processes used to calculate Planning Transfer Capabilities. The introduction of this new terminology and possibly new processes to determine PTCs may undermine efforts taken by utilities
Venkataramakrishnan Vinnakota	BC Hydro	2		
Clement Ma	BC Hydro and Power Authority	5		

<sup>1</sup> The appeals process is in the [Standard Processes Manual](#).

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				to become compliant with the existing standards, introduces duplication and potential for confusion, and ultimately detract from the common goals of increased reliability.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard no longer requires the calculation of Transfer Capabilities. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers. The SDT believes there is a reliability related need for this assessment to be conducted. The SDT does not believe the TPL standards adequately cover the need at this time.</p>				
Ajay Garg	Hydro One Networks, Inc.	1	Negative	<p>Hydro One is casting a negative vote for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Introduction of the term Planning Transfer Capability does not provide any material difference with respect to the term Transfer Capability, which has been defined and adopted for a long period of time. The industry is familiar with this definition, and has a deep and unambiguous understanding of it. The proposed definition for Planning Transfer Capability is redundant and trivial since it still uses the Transfer Capability term within the definition, with additional wording to indicate it is calculated for the planning period only. We believe this distinction can be achieved simply by inserting the phrase "in the planning period" to the term Transfer Capability in the appropriate requirements of the standard.</li> <li>2. Creating additional definitions requires additional maintenance of the glossary, and may create conflicting understanding for the same terms defined in different jurisdictions and documents (e.g. regional standards, legislation, etc.), and is to be avoided if words in the standards can convey the same intent/meaning.</li> </ol>
David L Kiguel	Hydro One Networks, Inc.	3		
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The time period applicable to the assessment has been identified as the Near-Term Transmission Planning Horizon in the body of the requirements. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.</p>				
James McMorran	Nevada Power Co.	1	Negative	Negative ballot because PTC's, as described in the draft Standard, are duplicative to SOL's, which are already satisfactorily addressed in FAC-010 and FAC-014. The presence of this proposed Standard will unnecessarily confuse and complicate the overall requirements of the Planning Coordinator.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The SDT does not believe there is an overlap between the revised draft and the FAC-010 and -014. These deal with identification of SOLs. The revised FAC-013 standard's emphasis is on assessment of future reliability and facilities that may be impacted by</p>				

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changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities.				
Brad Chase	Orlando Utilities Commission	1	Negative	This standard requires that you document how you calculate ATC in the planning horizon if you use it -The standard (arguably) doesn't require you to calculate ATC in the planning horizon if you don't use it *However it would probably be safer to calculate one then argue you don't use it. -The standard set's no performance criteria, negative ATC is as good as positive ATC. *However if you do calculate a negative value, that becomes available for FERC to review and while it may not be strictly a standard violation, FERC could argue that you "aren't meeting your firm obligations"
<p><b>Response:</b> The standard does not require documenting how you calculate ATC in the planning horizon. The PTC definition has been deleted based on industry comments and the concept of transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.</p>				
John C. Collins	Platte River Power Authority	1	Negative	Much confusion between "Transfer Capabilities" and "SOLs" was introduced in the beginning. NERC planned to reduce this confusion by retiring FAC-012 and -013 along with implementation of the new MOD standards. The proposed FAC-013-2 fuels more confusion and is not necessary. We have FAC-010-2.1 that addresses the SOL methodology to be used by those calculating transfer capabilities in the Planning Horizon.
Brandy A Dunn	Western Area Power Administration	1		
Carol Ballantine	Platte River Power Authority	6		
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities.</p>				
Liam Noailles	Xcel Energy, Inc.	5	Negative	Much confusion exists regarding the practical distinction between "Transfer Capability", "Total Transfer Capability" and "System Operating Limit" in general and, in particular, regarding their significance as applied within the Western Interconnection. NERC planned to reduce this confusion by retiring FAC-012 and FAC-013 concurrent with the implementation of the MOD-028/029/030 standards addressing the transfer capability methodologies. The proposed FAC-013-2 fuels more confusion and is not necessary. We have FAC-010 that addresses the SOL methodology which, together with MOD-028/029/030 for transfer capability methodology, comprises a fully adequate suite of methodologies for calculating Transfer Capabilities in the Planning Horizon.
David F. Lemmons	Xcel Energy, Inc.	6		

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<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities. The SDT believes there is a reliability related need for the transfer capability assessment to be conducted. The SDT does not believe the standards referenced adequately cover the need at this time.</p>				
Frank F. Afranji	Portland General Electric Co.	1	Negative	PGE agrees with the WECC position paper that the primary concern identified as being the confusion regarding the need to calculate PTCs. We support the question seeking clarity regarding how calculating PTCs differ from calculating Total Transfer Capability and/or SOLs. Based on the time horizons identified within the MOD standards additional clarification is needed.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOL's. The standard no longer requires the calculation of Transfer Capabilities.</p>				
Laurie Williams	Public Service Company of New Mexico	1	Negative	The requirements included in the standard are appropriate for the calculation of PTCs, however, the primary concern is the confusion regarding the need to calculate PTCs. Other NERC standards, FAC-010 and FAC-014, require the Planning Coordinator to have a documented methodology and to follow that methodology in calculating its System Operating Limits (SOLs). Questions seeking clarity regarding how calculating PTCs differ from calculating Total Transfer Capability and/or SOLs have not cleared up the confusion. In their response to comments from the last posting the drafting team indicated that there is no relationship between the FAC-010/FAC-14 and FAC-013. The drafting team indicated that FAC-010/FAC-14 deal with calculation and communication of SOLs while FAC-013 only requires calculation of PTCs according to the Planning Coordinator's PTCMD, which is based on the PC's criteria. For instance, PTCs may be calculated between areas where no SOL is established. This does not clear up the confusion for many entities in the West related to the difference between a PTC and an SOL. Because of this confusion, PNM believes that FAC-013-2 is duplicative of existing NERC standards and is therefore unnecessary.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SO's. The standard no longer requires the calculation of Transfer Capabilities.</p>				

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Catherine Koch	Puget Sound Energy, Inc.	1	Negative	It appears that PTCs are proposed to be determined for all paths and facilities that already require SOLs to be calculated, and we find no exceptions to this in FAC-010. If there are paths and facilities that do not require SOLs, however, that need PTCs, this needs to be explained. The Planning Methodology requirements of FAC-010 for SOLs seem to parallel the FAC-013-2 requirements. If there are requirements in FAC-013-2 that also need to be imposed in the calculation of reliable SOLs, those requirements need to be added to FAC-010-2. Clarification would be helpful to distinguish between SOLs and Transfer Capabilities as the latter typically is based on the former in WECC and additional methodology appears to be redundant.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities.</p>				
Tim Kelley	Sacramento Municipal Utility District	1	Negative	Given the proposed definition for Planning Transfer Capability (PTC), SOL and PTC for a 13 month plus planning horizon could be identical methodology/ methodologies. Confusion arises between Planning Transfer Capability and System Operating Limits for the Planning Horizon. Without a clear delineation of terms between SOL & PTC it is difficult to bifurcate the specific standards requirements and exposes entities to violation across Standards. It would be helpful in a decision to cast an Affirmative vote if the drafting team provides a clear description of the differences between an SOL for the Planning Horizon and a Planning Transfer Capability, that demonstrates why this standard is needed.
James Leigh-Kendall		3		
Mike Ramirez		4		
Bethany Wright		5		
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities.</p>				
Dana Cabbell	Southern California Edison Co.	1	Negative	The proposed FAC-013-2 requires the Planning Coordinator to develop and document a Planning Transfer Capability Methodology Document (PTCMD), to issue a PTCMD to identified entities, to respond to technical questions regarding the PTCMD, and to verify or recalculate Planning Transfer Capabilities (PTCs) at least once a year. SCE has reviewed FAC-013-2 and generally agrees that the requirements included in the standard are appropriate for the calculation of PTCs. However, confusion exists regarding the need to calculate PTCs. Other NERC standards, such as FAC-010 and FAC-014, require the Planning Coordinator to have a documented methodology and to follow that methodology in calculating its System
David Schiada	Southern California Edison Co.	3		

Voter	Entity	Segment	Vote	Comment
				<p>Operating Limits (SOLs). The proposed FAC-013-2 does answer SCE's questions about how calculating PTCs differs from calculating Total Transfer Capability and/or SOLs. In its responses to comments from the last posting of the standard, the drafting team indicated that there was no relationship between the FAC-010/FAC-14 and FAC-013. The drafting team indicated that FAC-010/FAC-14 deal with calculation and communication of SOLs, while FAC-013 only requires calculation of PTCs according to the Planning Coordinator's PTCMD, which is based on the PC's criteria. The drafting team asserted that PTCs may be calculated between areas where no SOL is established. However, this response does not clear up the confusion related to the difference between a PTC and an SOL. Because of this confusion, SCE believes that additional clarification in FAC-013-2 is required.</p>
<p><b>Response:</b> The PTCMD definition and PTC definition have been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities.</p>				
Gregory Van Pelt	California ISO	2	Negative	<p>We ask the SDT to clearly explain what the difference is between PTCs and SOLs in the planning horizon. Are PTCs different from SOLs in the planning horizon? Additional clarification is required from that previously provided by the SDT to clearly address the unresolved questions for entities in the Western Interconnection still asking the question as to what's the difference between PTCs and SOLs in the planning horizon, and whether FAC-013-2 is duplicative of existing NERC standards. How would the PTCMD methodology in FAC-013-2 differ from the SOL methodology for the planning horizon for FAC-010-2.1 and from the existing requirements in FAC-014 R3 and R5.3?</p>
<p><b>Response:</b> The PTC and PTCMD definitions have been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities.</p>				
Kim Warren	Independent Electricity System Operator	2	Negative	<p>We repeat our main objection that is also contained in the comment form for this project. We continue to disagree with the need to define these two new terms. A review of the Comment Report also suggests that the majority of the commenters disagree with the need to define these terms. We are disappointed that the SDT chose to ignore the majority comments. Our previous comments suggested that the term PTC does not provide any material difference than the term Transfer Capability, which has been</p>

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				<p>defined and adopted for a long period of time. The industry is familiar with this definition, and has a deep and unambiguous understanding that in general term, it is the attainable level of power transfer from one point to another or on a specific transmission path. The proposed definition for PTC is redundant and trivial since it still uses Transfer Capability as a defined term, with additional wording to indicate it is calculated for the planning period only. We believe this distinction can be achieved simply by inserting the phrase "in the planning period" to the term Transfer Capability in the appropriate requirements of the standard. Creating additional definitions require additional maintenance of the glossary, and may create conflicting understanding for the same terms defined in different jurisdiction and documents (e.g. regional standards, legislation, etc.), and is to be avoided if words in the standards can convey the same intent/meaning.</p> <p>Additionally, We concur with the list of elements to be addressed in R1.1, and with the inclusion of R1.2 and R1.5, but have the following comments on R1.3 and R1.4. R1.3 - For clarity we recommend appending " including IROLs." R1.4 should be removed. The appropriate assumptions are determined by the planning assessment personnel. The assumption can be more or less stringent than those applied in the operation horizon depending on the known and expected system conditions. Also, the criteria used in the two horizons can be different. For example, the TPL standards stipulate the contingency and performance requirements for planning assessment but the same set of comprehensive requirements do not currently exist for operation study or SOL/IROL calculations. Some in the industry have made it known that they would apply different contingency/performance criteria to operation assessment and in planning assessment. The industry's rejection to the SAR 2 years ago which proposed changes to FAC-010 and FAC-011 to achieve consistency in the planning and operation criteria provides this evidence.</p>
<p><b>Response:</b> The PTC and PTCMD definitions have been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The time period applicable to the assessment has been identified as the Near-Term Transmission Planning Horizon in the body of the requirements. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The standard no longer requires the calculation of Transfer Capabilities. The SDT believes IROLs are included by definition and including again would be redundant. Requirement R1 Part 1.4. (now Requirement R1 Part 1.3.) is included to address a FERC directive. It has been modified to include the phrase "... consistent with the Planning Coordinator's planning practices."</p>				

Voter	Entity	Segment	Vote	Comment
Stan T. Rzad	Keys Energy Services	1	Negative	It is unclear whether PTC is intended to be analogous with a total transfer capability or an available transfer capability for the long term. Without that clarity, there will be inconsistency on what PTC means to difference PCs. It is important to the value of the standard and to gain consistency to clarify this and to enable those entities who receive the information to understand both the allegorical total and available transfer capabilities. Please see FMPA's comments submitted through the formal process for more detail.
Walt Gill	Lake Worth Utilities	1		
Randall McCamish	City of Vero Beach	1		
Frank Gaffney	Florida Municipal Power Agency	4		
Gregg R Griffin	City of Green Cove Springs	3		
Gregory David Woessner	Kissimmee Utility Authority	3		
Richard L. Montgomery	Florida Municipal Power Agency	6		
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The standard no longer requires the calculation of Transfer Capabilities. Please see response to the FMPA comments.</p>				
David Schumann	Florida Municipal Power Agency	5	Negative	It is unclear whether PTC is intended to be analogous with a total transfer capability or an available transfer capability for the long term. Without that clarity, there will be inconsistency on what PTC means to difference PCs. It is important to the value of the standard and to gain consistency to clarify this and to enable those entities who receive the information to understand both the allegorical total and available transfer capabilities.
Richard Kinass	Orlando Utilities Commission	5		
Thomas W. Richards	Fort Pierce Utilities Authority	4		
Timothy Beyrle	City of New Smyrna Beach Utilities Commission	4		
Paul Shipps	Lakeland Electric	6		

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<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The standard no longer requires the calculation of Transfer Capabilities.</p>				
Christopher L de Graffenried	Consolidated Edison Co. of New York	1	Negative	<p>1. Clarification is needed for Text box on top of page 3 - Difference between "Available Transfer Capabilities" and "Available Flowgate Capabilities"</p> <p>2. R1-part 1.1-last bullet - "Reliability margins applied to reflect uncertainty with BES conditions." It sounds as if a reducing factor should be applied to calculated transfer capabilities to account for uncertainty in BES conditions. This is currently not done, nor is it recommended going forward, given the fact the a transmission adequacy assessment such as this one is deterministic in nature. Transfer capability, from a planning perspective, is performed assuming all system elements in service. Alternatively, the System Operating Limits computation is an assessment of specific system conditions projected for the short term horizon (i.e. seasonal). Other types of analysis, such as the LOLE (Loss Of Load Probability) are a different type of assessment based on a probabilistic approach.</p> <p>3. Is there a particular significance to the fact that we use the term "Limit" when referring to System Operating Limits, while we use the term Capability when referring to Planning Transfer Capabilities?</p>
Peter T Yost	Consolidated Edison Co. of New York	3		
Wilket (Jack) Ng	Consolidated Edison Co. of New York	5		
Nickesha P Carrol	Consolidated Edison Co. of New York	6		
<p><b>Response:</b> The text box has been removed and the revised standard does not include any references to ATC or AFT. The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The referenced last bullet has been removed from the standard. The standard no longer requires the calculation of Transfer Capabilities.</p>				
Janelle Marriott	Tri-State G & T Association, Inc.	3	Negative	<p>Question 1 - definition of Planning Transfer Capability (PTC) Tri-State finds that sets of TTC values TOs maintain, which are calculated for all posted paths, is sufficient to quantify TTC and ATC both in the operating timeframe and into the planning timeframe. We find creation of an additional term (PTC) unnecessary and think it will be confusing. In particular, there would be no less confusion as to what time frame "PTC" is stated for. It would be sufficient to state when and by how much TTC is expected to change upon completion of some future system modification. There can also be some confusion whether PTC is Planning-timeframe Transfer Capability, comparable to ATC, or Planning-timeframe Total Transfer Capability, comparable to TTC.</p> <p>Question 2 - Planning Transfer Capability Methodology Document (PTCMD)</p>

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				<p>Changing the term from "ID" (implementation document) to "MD" adds confusion because it differs from the convention used in MOD-001 through MOD-030.</p> <p>3 yes 4 no comment 5 yes 6 no comment</p> <p>Question 7 - does the proposed standard improve reliability? Proposed ratings used in study work can verify that reliability will be maintained and improved with, say, changes in resource size and locations. Planning-timeframe transfer capability values will most likely be the same as existing Total Transfer Capabilities for any posted path - WECC Paths in particular. The useful information is when and by how much will particular ratings change in the future. Requiring a PTC value for every path may just increase the quantity of information that must be processed to find significant changes.</p> <p>Question 8 - any other comments R1.4 It would be much simpler to say "PTC calculations will use assumptions and criteria comparable to those used for MOD-029 through MOD-030." This standard does not specify any particular timeframe beyond the operating horizon. Presumably, this means the PC would not study any timeframe beyond the expected in-service date of the latest committed generation or transmission projects in the PC's area.</p>
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The use of the term PTCMD has been eliminated.</p> <p>The SDT does not believe there is an overlap between the revised draft and the MOD standards. These deal with calculation of ATC/AFC. The revised FAC-013 standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.</p> <p>The SDT has modified the standard to require that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices.</p>				
Donald E. Nelson	Commonwealth of Massachusetts Department of Public Utilities	9	Negative	The term "Planning Transfer Capability" did not need to be a defined term and the RSC saw this as problematic
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon.</p>				

Voter	Entity	Segment	Vote	Comment
Jerome Murray	Oregon Public Utility Commission	9	Negative	The primary concern identified is confusion regarding the need to calculate PTCs. Other NERC standards, FAC-010 and FAC-014, require the Planning Coordinator to have a documented methodology and to follow that methodology in calculating its System Operating Limits (SOLs). Questions seeking clarity regarding how calculating PTCs differ from calculating Total Transfer Capability and/or SOLs have not cleared up the confusion. In their response to comments from the last posting the drafting team indicated that there is no relationship between the FAC-010/FAC-14 and FAC-013. The drafting team indicated that FAC-010/FAC-14 deal with calculation and communication of SOLs while FAC-013 only requires calculation of PTCs according to the Planning Coordinator's PTCMD, which is based on the PC's criteria. For instance, PTCs may be calculated between areas where no SOL is established. This does not clear up the confusion for many entities in the West related to the difference between a PTC and an SOL. Because of this confusion, FAC-013-2 is duplicative of existing NERC standards and is therefore unnecessary.
<p><b>Response:</b> The PTC and PTCMD definitions have been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities. The SDT believes there is a reliability related need for this assessment to be conducted. The SDT does not believe the TPL standards adequately cover the need at this time.</p>				
James D Burley	Midwest Reliability Organization	10	Negative	It is questionable what Planning Transfer Capabilities values are used for in the planning horizon. It is not clear if the planning coordinator will indicate what the PTC values represent (specific transmission service requests, first contingency incremental transfer capability, an off-peak condition, a peak condition, or specific operating condition). It is not clear what an operator would do with PTC values that may not represent the operating horizon. Ignoring the PTC value, the standard, in requirement R3 and R2.3, needs clarification such that it removes the administrative burden levied on the Planning Coordinator. This burden does not appear congruent with FERC order 890 which already requires the Planning Coordinators to solicit input from stakeholders plus the standard does not address any criteria as to what would be an appropriate reliability related need.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The standard no longer requires the calculation of Transfer Capabilities. The SDT believes there is a reliability related need for this assessment to be conducted. The SDT does not believe the TPL standards</p>				

Voter	Entity	Segment	Vote	Comment
adequately cover the need at this time. Coordination of planning assessments is important to effective planning for future reliable system performance. The NERC Reliability Standards apply to all NERC registered entities. Order 890 processes do not.				
Louise McCarren	Western Electricity Coordinating Council	10	Negative	<p>Despite what on its own merit appears to be appropriate requirements for documenting a methodology, communicating that methodology, responding to technical comments regarding that methodology, and verifying or recalculating Planning Transfer Capabilities in accordance with that documented methodology, we are casting a negative vote on FAC-013-2. We believe there is still significant confusion in the industry regarding the need for FAC-013-2. Many believe that FAC-013-2 is duplicative of the requirements of FAC-010-2 to develop and document a System Operating Limits Methodology for the Planning Horizon and FAC-014-2 to establish and communicate those System Operating Limits for the Planning Horizon in accordance with the Methodology developed for FAC-010-2.</p> <p>In responses to comments from the industry, the Drafting Team replied to a comment from Bonneville Power Administration seeking clarification of the relationship between System Operating Limits (SOLs) and a Planning Transfer Capability by stating that FAC-010/FAC-014 deal with the calculation and communication of SOLs while FAC-013 deals with the calculation of PTCs. This factual statement does not clarify the difference between and SOL and a PTC. It only indicates that the two are different. The FAC-013-2 - Planning Transfer Capability White Paper correctly states that the MOD standards only require for the calculation of available transfer capability in the operating horizon. FAC-014 requires the calculation of SOLs for the planning horizon. This seems to identify limits for transfers on the BES in the planning horizon. Without explaining the difference between and SOL and a PTC, requiring the calculation of a PTC for years 2-5 seems duplicative of the requirement for developing SOLs for the planning horizon. The white paper also indicates that PTC calculations are not intended to supersede nor replace SOLs, stating that the calculations for SOLs are based on specific requirements while the calculation of PTCs are based on a methodology determined by the Planning Coordinator. If the Planning Coordinator determined that their methodology for calculating PTCs would be identical to that identified for calculating SOLs in FAC-14, what would be the difference between these two limits? We believe that the drafting team needs to provide a clear description of the difference between a System Operating Limit for the Panning Horizon and a Planning Transfer Capability that, among other things, is required to respect all</p>

Voter	Entity	Segment	Vote	Comment
				applicable System Operating Limits. Many entities in the West believe these to be the same thing. If the drafting team can provide a clear description of the differences between an SOL for the Planning Horizon and a Planning Transfer Capability, that demonstrates why this standard is needed, we would change our vote to affirmative in a subsequent ballot.
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities. The intent of R1.3. (now R1.2.), regarding applicable SOLs, is to ensure the methodology requires the processes Planning Coordinators use to determine and assess transfer capabilities respects all known SOLs – not the identification of new SOLs. The SDT agrees that In many areas, the requirements of this standard are in concert with existing practices and are already considered good utility practice. Therefore, the new standard codifies these practices.</p>				
Chifong L. Thomas	Pacific Gas and Electric Company	1	Negative	<p>PG&amp;E casted a negative vote for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Adding another term, "Planning Transfer Capability" for the planning period is not necessary and can be confusing. It is also not clear where this methodology would be applied if "The calculation of Planning Transfer Capabilities is not meant to be a starting point for calculation of Available Transfer Capabilities or Available Flowgate Capabilities."</li> <li>2. R1 is overly prescriptive and seems to duplicate FAC-010 (the methodology for SOL in the planning horizon).</li> <li>3. Requirement R1.4 disregards the differences between planning and operating practices. R1.4 requires that the Methodology Document" includes: "A statement that the assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon." Since Planning is to determine future transmission investments, it is usual for planning assumptions to represent average system conditions starting with all facilities in service. Sensitivity cases may be run, but they may not be the ones used to set the PTCs. Since operating conditions typically do not have all facilities in service, and must represent the system as is expected in the near term (for example, a drought condition), which will be different from an "average" condition, it is therefore not reasonable (and may not be possible) to make a statement that the "assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon".</li> </ol>
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOLs. The standard no longer requires the calculation of Transfer Capabilities.</p>				

Voter	Entity	Segment	Vote	Comment
<p>Requirement R1 has been modified to remove the list of all PTCs to be calculated and is intended to provide Planning Coordinators sufficient flexibility to document a Transfer Capability Methodology that focuses on assessing transfer capabilities that affect reliability of the BES versus those that do not. Requirement R1 Part 1.4 (now Requirement R1 Part 1.3) has been modified to now read "A statement that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices."</p>				
John Canavan	NorthWestern Energy	1	Negative	<p>R1.2. More guidance is needed to compile a list of Planning Transfer Capabilities (PTC) that need to be calculated. Does it only apply to the paths that are listed in the Western Electricity Coordinating Council (WECC) Path Rating Catalog? These paths are already being studied through Operating Transfer Capability (OTC) studies required by the Northwest Operational Planning Study Group study process (NOPSG), which is an oversight committee that reviews the Pacific Northwest sub region of WECC. Or does it apply to all the transmission lines that comprise the bulk electric system (BES)?</p> <p>R4. When the Planning Coordinator verifies the PTCs calculated for the previous year, what guidelines are used to decide if the criteria or assumptions have changed? Generation dispatch is constantly changing, and system demand is also constantly changing. There could be a maximum MW change that would prompt a new PTC calculation. Does "good engineering judgment" qualify as a method to determine if new PTC calculations are needed?</p>
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The standard no longer requires the calculation of Transfer Capabilities. It applies to Transfer Capabilities in the Near-Term Transmission Planning Horizon based on the criteria for selection of transfers to be assessed contained in the Planning Coordinator's Transfer Capability Methodology. Requirement R4 has been modified and no longer requires verification of the PTCs calculated for the previous year.</p>				
Keith V. Carman	Tri-State G & T Association, Inc.	1	Negative	<p>Tri-State finds that sets of TTC values TOs maintain, which are calculated for all posted paths, is sufficient to quantify TTC and ATC both in the operating timeframe and into the planning timeframe. We find creation of an additional term (PTC) unnecessary and think it will be confusing. In particular, there would be no less confusion as to what time frame "PTC" is stated for. It would be sufficient to state when and by how much TTC is expected to change upon completion of some future system modification. There can also be some confusion whether PTC is Planning-timeframe Transfer Capability, comparable to ATC, or Planning-timeframe Total Transfer Capability, comparable to TTC. Changing the term from "ID" (implementation document) to "MD" adds confusion because it differs from the convention used in MOD-001 through MOD-030. Proposed ratings used</p>

Voter	Entity	Segment	Vote	Comment
				<p>in study work can verify that reliability will be maintained and improved with, say, changes in resource size and locations. Planning-timeframe transfer capability values will most likely be the same as existing Total Transfer Capabilities for any posted path - WECC Paths in particular. The useful information is when and by how much will particular ratings change in the future. Requiring a PTC value for every path may just increase the quantity of information that must be processed to find significant changes. In R1.4 it would be much simpler to say "PTC calculations will use assumptions and criteria comparable to those used for MOD-029 through MOD-030." This standard does not specify any particular timeframe beyond the operating horizon. Presumably, this means the PC would not study any timeframe beyond the expected in-service date of the latest committed generation or transmission projects in the PC's area.</p>
<p><b>Response:</b> The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The standard no longer requires the calculation of Transfer Capabilities. Requirement R1 has been modified to remove the list of all PTCs to be calculated and is intended to provide Planning Coordinators sufficient flexibility to document a Transfer Capability Methodology that focuses on assessing transfer capabilities that affect reliability of the BES versus those that do not. Requirement R1 Part 1.4 (now Requirement R1 Part 1.3) has been modified to now read "A statement that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices." The revised standard does include a reference to the "Near-term Planning Horizon" for additional clarity and requires the Planning Coordinator to do an assessment for one year in the Near-term Planning Horizon.</p>				
Jason Shaver	American Transmission Company, LLC	1	Negative	<p>The Planning Transfer Capability idea should be retired since it does not have any benefits for BES reliability, but will cause additional burden and confusion for Planning Coordinators:</p> <ul style="list-style-type: none"> <li>o Transfer capabilities in the planning horizon are not useful for the reliable planning of the transmission system and/or any expansion plans. The current, approved TPL standards already provide system expansion requirements to assure reliable system performance with regard to firm transfer commitments, but not to limits that may exceed those firm commitments such as those that would be indicated in PTC calculations. Further, it must be noted that there are no TPL standards that require system expansion for maintenance of transfer capabilities above firm transfer commitments. As such, transfer capabilities in the planning horizon provide no additional information that can be used for system planning.</li> <li>o Transfer capabilities calculated 2 to 5 years ahead are not useful to give system operators advance warning or appropriate, applicable operating</li> </ul>

Voter	Entity	Segment	Vote	Comment
				limits because operating horizon conditions will be significantly different than those projected during the planning horizon (2 to 5 years previously).
<p><b>Response:</b> The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers. The SDT believes there is a reliability related need for this assessment to be conducted. The standard no longer requires the calculation of Transfer Capabilities.</p> <p>The SDT does not believe the TPL standards adequately cover the need at this time.</p> <p>The revised standard requires the Planning Coordinator to do a Transfer Capability assessment for one year in the Near-term Planning Horizon.</p>				
Jason L Marshall	Midwest ISO, Inc.	2	Negative	<p>The Planning Transfer Capability idea should be retired since it does not have any benefits for BES reliability, but will cause additional burden and confusion for Planning Coordinators:</p> <ul style="list-style-type: none"> <li>o Transfer capabilities in the planning horizon are not useful for the reliable planning of the transmission system and/or any expansion plans. The current, approved TPL standards already provide system expansion requirements to assure reliable system performance with regard to firm transfer commitments, but not to limits that may exceed those firm commitments such as those that would be indicated in PTC calculations. Further, it must be noted that there are no TPL standards that require system expansion for maintenance of transfer capabilities above firm transfer commitments. As such, transfer capabilities in the planning horizon provide no additional information that can be used for system planning.</li> <li>o Transfer capabilities calculated 2 to 5 years ahead are not useful to give system operators advance warning or appropriate, applicable operating limits because operating horizon conditions will be significantly different than those projected during the planning horizon (2 to 5 years previously).</li> </ul> <p>While we disagree with the need for the standard as a whole, the following comments are offered:</p> <ul style="list-style-type: none"> <li>o The development of the PTCMD, as described in the standard, creates confusion as to whether the PTCMD is intended to describe: (1) the entity's methodology for continued calculation of ATC for the 2 to 5 year horizon as such values would be calculated in response to specific transmission service requests or (2) the entity's methodology for calculation of FCITC in the 2 to 5 year horizon. More specifically, Requirement R1 requires that, at a minimum, the PTCMD include "a description of the assumptions and criteria used in the calculation of Planning Transfer Capabilities (PTCs) to include at a minimum how each of the following are addressed, or an explanation for any of the following not used in the calculation of PTC...". Included in these</li> </ul>

Voter	Entity	Segment	Vote	Comment
				<p>required elements, at Part 1.1, are “Reliability margins applied to reflect uncertainty with BES conditions” and, at R1.4, are “A statement that the assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon”. The inclusion of these elements in the calculation of PTC strongly suggests that the intent of this standard and the PTCMD is to describe an entity’s methodology for calculation of ATC values for the Planning Horizon. The requirement to include ‘Reliability Margins’ in the PTC calculation or to provide a justification for not doing so described in R1.1 strongly suggests that the standard has been drafted with the calculation of ATC values as its primary intent. The concept of reliability margins (Capacity Benefit Margin and Transmission Reserve Margin) was specifically designed for the purposes of calculating ATC and selling transmission service in response to FERC’s final rules in Orders 888 and 889. Reliability margins are designed to ensure that transmission service is not sold past the point of where the Bulk Electric System (“BES”) will be secure and to ensure that the network transmission customers will have access to generation resources. As well, the requirement set forth in R1.1.4, which requires that ‘A statement that the assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon’ be included in the PTCMD indicates that the assumptions and criteria utilized to calculate ATC values under the MOD standards and PTC values under the draft FAC-013-2 standard should be as similar as possible, which also strongly suggests that the standard has been drafted with the calculation of ATC values as its primary intent. Further, the intent of R1.1.4 is unclear and seems counterintuitive to current practices in that the assumptions in the planning horizon are, by virtue of the uncertainties associated with effects of time, less accurate than the operating horizon.</p> <p>o R3 should be removed from the standard as it is an administrative requirement that is unnecessary, contrary to the results-based standards effort and duplicative of existing statutory requirements. More specifically, R3 mandates a stakeholder process for the PTCMD and the calculation of PTC values generally, which process provides no reliability benefit, but provides a method for entities to dispute or request modification to the calculation of specific PTC values, which exceptions must then be documented in a revised PTCMD. The requirement to respond to all technical comments and/or revise PTCs and the PTCMD would be a significant administrative burden to the Planning Coordinators. Additionally,</p>

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				<p>it should be noted that the NERC Board of Trustees approved the results-based standards initiative which includes a specific, stated goal to eliminate purely administrative requirements, which R3 is. Finally, FERC Order 890 already contains requirements for transmission planners to have stakeholder process. Accordingly, stakeholders already have a process through which they can address, with Planning Coordinators, issues with values and/or assumptions used in the planning horizon and/or system expansion plans.</p> <p>o Part 2.3 should be either be removed due to its subjective nature or criteria for requesting such data should be added to clarify what entities can request such data, under what circumstances they can do so, and how disputes regarding such requests are to be resolved. More specifically, R3 contains no indication regarding the entity that makes the determination that a functional entity had a reliability-related need to the PTCs.</p> <p>Additionally, there are no dispute resolution provisions to govern disagreements between Planning Coordinators and entities requesting data under R3. Accordingly, the drafting team should either remove R3 from the standard or review the functional entities in the functional model and add the specific entities that should have access to the PTCs.</p>
<p><b>Response:</b> The revised standard does not require the calculation of Transfer Capabilities. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers. The SDT believes there is a reliability related need for this assessment to be conducted. The SDT does not believe the TPL standards adequately cover the need at this time.</p> <p>No stakeholder process is mandated, the standard only requires response to written comments from parties that have a reliability related need for the assessment. Coordination of planning assessments is important to effective planning for future reliable system performance and meets a reliability related need in accordance with the results-based philosophy.</p> <p>The NERC Reliability Standards apply to all NERC registered entities. Order 890 processes does not.</p>				
Leonard Rentmeester	Wisconsin Public Service Corp.	5	Negative	The basis for the negative vote is contained in the comments provided by the MRO NSRS
<p><b>Response:</b> Response to be consistent with that to MRO NSRS.</p>				
Robert D Smith	Arizona Public Service Co.	1	Negative	R1.4 requires that assumptions and criteria to calculate PTCs be as, or more limiting than the assumptions and criteria used in operating horizon. This is a vague requirement. The standard needs to provide specific guidelines on how to achieve this or R1.4 should be removed.
Steven Norris	APS	3		

Voter	Entity	Segment	Vote	Comment
Mel Jensen	APS	5		
<b>Response:</b> The statement has been revised to require (under new Requirement R1 Part 1.3) that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices because the purpose of the standard is to support planning for reliable system operation in the planning horizon.				
Scott Kinney	Avista Corp.	1	Negative	Requirement R1.4 disregards the differences between planning and operations. R1.4 requires that the Methodology Document" includes: "A statement that the assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon." Since operating assumptions represent short term current operating conditions (such as planned short term outages and low hydro), it is not reasonable to have a requirement that "assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon".
Edward F. Groce	Avista Corp.	5		
<b>Response:</b> The statement has been revised to require (under new Requirement R1 Part 1.3) that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices because the purpose of the standard is to support planning for reliable system operation in the planning horizon.				
Justin Thompson	Arizona Public Service Co.	6	Negative	R1.4 requires that assumptions and criteria to calculate PTCs be as, or more limiting than the assumptions and criteria used in operating horizon. This is a vague requirement. The standard needs to provide specific guidelines on how to achieve this or R1.4 should be removed.
<b>Response:</b> The statement has been revised to require (under new Requirement R1 Part 1.3) that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices because the purpose of the standard is to support planning for reliable system operation in the planning horizon.				
John Bussman	Associated Electric Cooperative, Inc.	1	Affirmative	see comments
<b>Response:</b> Please see response to comments.				
Joseph S. Stonecipher	Beaches Energy Services	1	Negative	(See my comments on the Comment Form.)
<b>Response:</b> Please see response to comments.				

Voter	Entity	Segment	Vote	Comment
Donald S. Watkins	Bonneville Power Administration	1	Negative	Please refer to BPA comments submitted during the formal comment period on 10/26/10
<b>Response:</b> Please see response to comments				
George S. Carruba	East Kentucky Power Coop.	1	Negative	The additional requirements included in the new FAC-013-2 standard when compared to the FAC-012-1 do not add much value in terms of increased reliability. These items require the Planning Coordinator to simply describe in more detail which PTCs have been calculated and how. This will have minimal impact on reliability. Sub-requirement 1.4 (A statement that the assumptions and criteria used to calculate PTCs are as, or more, limiting than the assumptions and criteria used in the operating horizon) is of questionable merit. There may be valid reasons why assumptions and criteria used in the operating horizon may be more limiting than those used in the planning horizon. Each Planning Coordinator should decide what criteria and assumptions are used in the planning horizon vs. the operating horizon without a requirement that the planning horizon is always as, or more, limiting. PTCs are not likely to translate into the operating horizon in any event. This sub requirement has no positive impact on reliability of the BES.
Sally Witt	East Kentucky Power Coop.	3		
Stephen Ricker	East Kentucky Power Coop.	5		
<b>Response:</b> This draft standard merges the planning requirements in FAC-012-1 and FAC-013-1. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers. The SDT believes there is a reliability related need for this assessment to be conducted. The SDT does not believe the TPL standards adequately cover the need at this time.  Requirement R1, Part 1.4 - The SDT agrees and has modified the standard to require that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers. The SDT believes there is a reliability related need for this assessment to be conducted.				
Ronald D. Schellberg	Idaho Power Company	1	Negative	Do not see the rationale for having yet another transfer capability value. SOLs and IROLs lead to enough confusion. SOL studies are adequate to define transfer capabilities.
<b>Response:</b> The revised standard does not require the calculation of Transfer Capabilities. The concept of transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values nor defining SOL's. The SDT believes there is a reliability related need for this assessment to be conducted.				
Ted E Hobson	JEA	1	Negative	Based on the stated purpose of the standard, Requirement R1.2 language should be enhanced for clarity to state: "A list of PTCs to be calculated, which are needed for reliability planning coordination" instead of the existing language "A list of all PTCs to be calculated" to

Voter	Entity	Segment	Vote	Comment
				Concerning R4 language: recommend improving clarity and direction with the following language: "R4. Each planning Coordinator shall verify and, if assumptions or criteria as described in the PTCMD have changed, recalculate its PTCs consistent with its PTCMD for beyond 13 months and representative year(s) of the timeframe through year five (to capture system changes that affect PTC) at least once each calendar year, with no more than 15 months between verifications." It was unclear about what is meant by "for years two through five" which may be overly excessive for the purpose of this standard.
<p><b>Response:</b> The revised standard does not require the calculation of Transfer Capabilities – it requires an assessment of Transfer Capability. The standard has been modified to allow for a methodology that results in a more efficient and flexible process of determining or assessing the impacts of transfers on facilities in the Near-Term Transmission Planning Horizon. The SDT agrees that assessments do not need to be performed for each year 2-5 and has revised the standard to require assessment of Transfer Capability for one year in the Near-Term Transmission Planning Horizon.</p>				
W. R. Schoneck	Florida Power & Light Co.	3	Negative	This version is a big improvement over the last version but additional clarification is still needed for an affirmative vote .Since the Purpose of the standard states that Planning Transmission Capabilities are needed for reliable planning of the Bulk Electric System. The PTC forecasts need to be reliability based to be meaningful for planning by determining adequate long term capability to ensure reliable operation in the future. Consistent with the stated purpose, Requirement R1.2 should be changed from "A list of all PTCs to be calculated" to "A list of PTCs to be calculated, which are needed for reliability planning coordination" Additionally, Requirement R4 is unclear about what is meant by "for years two through five" and may be excessive. The requirement should allow for the PTC calculation to be performed on representative year(s) (years two through five) of the near-term planning horizon to capture changes affecting PTC. The requirement can be reworded as follows: "R4. Each planning Coordinator shall verify and, if assumptions or criteria as described in the PTCMD have changed, recalculate its PTCs consistent with its PTCMD for beyond 13 months and representative year(s) of the timeframe through year five (to capture system changes that affect PTC) at least once each calendar year, with no more than 15 months between verifications."
<p><b>Response:</b> The Purpose of the standard has been clarified and now states:</p> <p>To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of, the ability to transfer energy (in the Near-Term Transmission Planning Horizon) to identify potential future weaknesses and limiting Facilities that could impact the reliability of the Bulk Electric System (BES).</p>				

Voter	Entity	Segment	Vote	Comment
<p>The revised standard does not require the calculation of Transfer Capabilities – it requires an assessment of Transfer Capability. The standard has been modified to allow for a methodology that results in a more efficient and flexible process of determining or assessing transfer capabilities in the Near-Term Transmission Planning Horizon. The SDT has changed the phrase “A list of all PTCs to be calculated” to provide the “criteria for selection of the transfers to be assessed. The standard no longer requires assessments to be performed for each year 2-5 - the revised standard requires an assessment of one year in the Near-Term Transmission Planning Horizon.</p>				
<p>Ronald L Donahey</p>	<p>Tampa Electric Co.</p>	<p>3</p>	<p>Negative</p>	<p>The Purpose of the standard states that Planning Transmission Capabilities are needed for reliable planning of the Bulk Electric System. The PTC forecasts need to be reliability based to be meaningful for planning by determining adequate long term capability to ensure reliable operation in the future. Consistent with the stated purpose, Requirement R1.2 should be changed from “A list of all PTCs to be calculated” to “A list of PTCs to be calculated, which are needed for reliability planning coordination”</p> <p>Requirement R4 is unclear about what is meant by “for years two through five” and may be excessive. The requirement should allow for the PTC calculation to be performed on representative year(s) (years two through five) of the near-term planning horizon to capture changes affecting PTC. The requirement can be reworded as follows: “R4. Each planning Coordinator shall verify and, if assumptions or criteria as described in the PTCMD have changed, recalculate its PTCs consistent with its PTCMD for beyond 13 months and representative year(s) of the timeframe through year five (to capture system changes that affect PTC) at least once each calendar year, with no more than 15 months between verifications.”</p> <p>The VSLs for R1 Lower and Moderate are inconsistent or contain an error. Recommend changing Moderate VSL (second part) to “The Planning Coordinator has a PTCMD but failed to address three or more of the items listed in Requirement R1, Part 1.1. The High and Severe VSLs for R1 should spell out the numerical 2 and 3 as “two” and “three” for consistency.</p> <p>The changes in severity levels for R2, R3, and R5 should be in multiples of 30 days, not in multiples of 10 days, which seems haphazardly chosen and severe for requirements that all have Lower VRFs.</p> <p>Similarly, R4 should be in multiples of 25% rather than 5%, particularly since there should not be a need to calculate very many PTCs because they should only be calculated for reliability enhancement reasons. Finally, the word “notified” in each VSL for R5 should be replaced with “made available to” in order to be consistent with the wording in R5.</p>

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> The Purpose of the standard has been clarified and now states:</p> <p>To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of, the ability to transfer energy (in the Near-Term Transmission Planning Horizon) to identify potential future weaknesses and limiting Facilities that could impact the reliability of the Bulk Electric System (BES).</p> <p>The revised standard does not require the calculation of Transfer Capabilities – it requires an assessment of Transfer Capability.</p> <p>The standard has been modified to allow for a methodology that results in a more efficient and flexible process of determining or assessing transfer capabilities in the Near-Term Transmission Planning Horizon. The SDT has changed the phrase “A list of all PTCs to be calculated” to provide the “criteria for selection of the transfers to be assessed.</p> <p>The standard no longer requires assessments to be performed for each year 2-5 - the revised standard requires an assessment of one year in the Near-Term Transmission Planning Horizon.</p> <p>Requirement R1 has been extensively revised; the SDT has modified the VSLs to be consistent with the new Requirement R1. The SDT has modified the Requirement R1 Lower and Moderate VSLs to “The Planning Coordinator has a Transfer Capability Methodology but failed to address one or two of the items listed in Requirement R1 Part 1.4”; “The Planning Coordinator has a Transfer Capability Methodology but failed to incorporate one of the Requirements R1 Parts 1.1, 1.2, 1.3, and 1.5 OR The Planning Coordinator has a Transfer Capability Methodology but failed to address three of the items listed in Requirement R1 Part 1.4.” A new High VSL was added for failure to address four of the items listed in Requirement R1, Part 1.4 – and a new Severe VSL was added for failure to address more than four items.</p> <p>The SDT chose increments for Requirements R2, R3 and R5 with increments that vary depending on the content of the requirement.</p> <p>Requirement R4 in the initial draft of FAC-013-2 has been replaced; the new VSLs for Requirement R4 do not use multiples.</p> <p><u>The SDT has modified Requirement R5 VSL to address your concern.</u></p>				
Terry Harbour	MidAmerican Energy Co.	1	Negative	MidAmerican supports the Midwest Independent System Operator and Midwest Reliability Organization NERC Standards Review Subcommittee positions that several issues in this proposed standard need to be addressed. While MidAmerican understands the need to ensure that entities do not discourage transmission schedules through different assumptions in planning and operation horizons, the fundamental issue with the proposed Planning Transfer Capability Methodology standard is that it continues to confuse operational and planning case assumptions in R1.1 (last bullet) and R1.4. Both items should be deleted. Fundamentally a future planning case is a prediction and model of reality which inherently assumes conditions that may or may not be more limiting when reality and the actual operating horizon is reached. Including requirements to provide documentation statements about assumptions are completely inconsistent with the results

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				based standards approach and should be eliminated in all future standards development.
Christopher Schneider	MidAmerican Energy Co.	5	Negative	MidAmerican supports the Midwest Independent System Operator and Midwest Reliability Organization NERC Standards Review Subcommittee positions that several issues in this proposed standard need to be addressed. While MidAmerican understands the need to ensure that entities do not discourage transmission schedules through different assumptions in planning and operation horizons, the fundamental issue with the proposed Planning Transfer Capability Methodology standard is that it continues to confuse operational and planning case assumptions in R1.1 (last bullet) and R1.4. Both items should be deleted. Fundamentally a future planning case is a prediction and model of reality which inherently assumes conditions that may or may not be more limiting when reality and the actual operating horizon is reached.
Dennis Kimm	MidAmerican Energy Co.	6		
<p><b>Response:</b>  Requirement R1, Part 1.4 - The SDT has modified the standard to require that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices. The standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers. The SDT believes there is a reliability related need for this assessment to be conducted.</p>				
Larry Akens	Tennessee Valley Authority	1	Negative Negative	<p>The intent of the standard still lacks clarity. The purpose statement reads: "To ensure that Planning Coordinators calculate Planning Transfer Capabilities using an established method such that those forecasts of Transfer Capabilities are available for the reliable planning of the Bulk Electric System (BES)." Resource Planners within a Planning Coordinator's area need an awareness of Planning Transfer Capability into their area of load responsibility in order to plan for sufficient resources inside the area. There is no requirement in the standard to communicate Transfer Capability to the Resource Planners within the Planning Coordinator's area. The proposed standard does not require any coordination between Planning Coordinators in performing these calculations. Planning Transfer Capability that is calculated outside of a jointly coordinated Planning Coordinator study process will likely produce forecasts of Planning Transfer Capability that are less reflective of planned system capabilities.</p> <p>Under R1.1.1, we believe that "monitored facilities" assumptions and criteria should also be addressed in the PTCMD.</p> <p>We believe that requirement R1.1.3 should be modified to reflect that PTC calculations respect TPL criteria as a basis for PTC calculations, rather than</p>
George T. Ballew	Tennessee Valley Authority	5		
Marjorie S. Parsons	Tennessee Valley Authority	6		

Voter	Entity	Segment	Vote	Comment
				<p>SOLs.</p> <p>The intent of R1.1.4 is unclear, particularly since the standard excludes calculation of Transfer Capability in the operating horizon (inside 13 months).</p>
<p><b>Response:</b> The Purpose of the standard has been clarified and now states:</p> <p>To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of, the ability to transfer energy (in the Near-Term Transmission Planning Horizon) to identify potential future weaknesses and limiting Facilities that could impact the reliability of the Bulk Electric System (BES).</p> <p>The revised standard does not require the calculation of Transfer Capabilities – it requires an assessment of Transfer Capability.</p> <p>The SDT believes that Requirement R2 provides the means for Resource Planners within the Planning Coordinator's area to provide input in to and receive data from a Planning Coordinator's processes required as part of this standard. The proposed standard does not preclude a Planning Coordinator from working with its Resource Planners and Transmission Planners or with other Planning Coordinators in developing its Transfer Capability methodology. The Requirements in R2, R3 and R5 of sharing methodology and results adequately addresses coordination between Planning Coordinators.</p> <p>Monitored facilities criteria have been added to Requirement R1 Part 1.1. (now Requirement R1 Part 1.4). Requirement R1 Part 1.4. (now Requirement R1 Part 1.3) is included to address a FERC directive. It has been modified to include the phrase "... consistent with the Planning Coordinator's planning practices."</p>				
John Tolo	Tucson Electric Power Co.	1	Negative	<p>Request clarification of the process to determine the various interchange schedules in the base cases that would be needed to calculate PTCs. Not clear if the process for calculating PTCs be the same as that which is used for the Operating Horizon. concern that the requirement to calculate PTCs, in the absence of clear procedures that take future planning uncertainty into account, will be unduly burdensome, while the value will likely be of little value relative to the transmission planning staffing resource impact.</p>
<p><b>Response:</b> The revised standard does not require the calculation of Transfer Capabilities – it requires an assessment of Transfer Capability. Requirement R1 has been modified to remove the list of all PTC's to be calculated. The revised requirement is intended to provide Planning Coordinators sufficient flexibility to document a Transfer Capability Methodology that focuses on assessing transfer capabilities that affect reliability of the BES versus those that do not.</p> <p>Requirement R1 Part 1.4 (now Requirement R1 Part 1.3) has been modified to now read "A statement that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator's planning practices."</p>				
Jonathan Appelbaum	United Illuminating Co.	1	Negative	<p>Comment form submitted.</p>
<p><b>Response:</b> Please see response to comments.</p>				

Voter	Entity	Segment	Vote	Comment
Chuck B Manning	Electric Reliability Council of Texas, Inc.	2	Negative	ERCOT ISO has joined in the submission of the IRC SRC comments and submitted independent comments through the online survey. Please see online survey submissions for details.
<b>Response:</b> Please see response to comments.				
Francis J. Halpin	Bonneville Power Administration	5	Affirmative	Please refer to BPA comments submitted during the formal comment period on 10/26/10
Rebecca Berdahl	Bonneville Power Administration	3	Negative	
<b>Response:</b> Please see response to comments.				
Charles A. Freibert	Louisville Gas and Electric Co.	3	Negative	LG&E and KU Energy support the comments submitted by the Midwest ISO.
Charlie Martin	Louisville Gas and Electric Co.	5		
Daryn Barker	Louisville Gas and Electric Co.	6		
<b>Response:</b> See responses to Midwest ISO comments.				
Michael Ibold	Xcel Energy, Inc.	3	Negative	See transmission comments.
<b>Response:</b> See responses to transmission comments.				
Pawel Krupa	Seattle City Light	1	Negative	The scope of the standard is unclear because it does not specify which entities, lines or paths it applies to. Further, Seattle believes this standard should specifically apply to a Planning Authority required by its Regional Reliability Organization to establish interregional and intra-regional Transfer Capabilities, and thus is duplicative of other existing NERC standards.
Hao Li	Seattle City Light	4		
Dana Wheelock	Seattle City Light	3		
Michael J. Haynes	Seattle City Light	5		
Dennis Sismaet	Seattle City Light	6		

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> The Purpose of the standard has been clarified and now states:</p> <p>To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of, the ability to transfer energy (in the Near-Term Transmission Planning Horizon) to identify potential future weaknesses and limiting Facilities that could impact the reliability of the Bulk Electric System (BES).</p> <p>The revised standard does not require the calculation of Transfer Capabilities – it requires an assessment of Transfer Capability. The standard allows each Planning Coordinator to determine the method (transfer level, paths, contingencies,...) that best allows them to identify potential future weaknesses and limiting facilities according to their understanding of the needs of the system.</p>				
James A Maenner		8	Negative	The overall purpose of this standard is not clear.
<p><b>Response:</b> The Purpose of the standard has been clarified and now states:</p> <p>To ensure that Planning Coordinators have a methodology for, and perform an annual assessment of, the ability to transfer energy (in the Near-Term Transmission Planning Horizon) to identify potential future weaknesses and limiting Facilities that could impact the reliability of the Bulk Electric System (BES).</p> <p>The revised standard does not require the calculation of Transfer Capabilities – it requires an assessment of Transfer Capability. The standard allows each Planning Coordinator to determine the method (transfer level, paths, contingencies,...) that best allows them to identify potential future weaknesses and limiting facilities according to their understanding of the needs of the system. The concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon.</p>				
Anthony E Jablonski	ReliabilityFirst Corporation	10	Affirmative	<p>Even though ReliabilityFirst voted affirmative, we have a few comments for the SDT to consider. They include:</p> <ol style="list-style-type: none"> <li>1. The Time Horizons are not consistent with the Criteria for Time Horizons as stated in the NERC Time_Horizons.pdf resource document. To be consistent the Time Horizons should include one of the following: <ol style="list-style-type: none"> <li>a. Long-term Planning - a planning horizon of one year or longer.</li> <li>b. Operations Planning - operating and resource plans from day-ahead up to and including seasonal.</li> <li>c. Same-day Operations - routine actions required within the timeframe of a day, but not real-time.</li> <li>d. Real-time Operations - actions required within one hour or less to preserve the reliability of the bulk electric system.</li> <li>e. Operations Assessment - follow-up evaluations and reporting of real time operations.</li> </ol> </li> <li>2. The bullet point under Part 1.1 should be renumbered to Part 1.1.1, 1.1.2, etc. Bullet points are generally considered "OR" statements in NERC Standards. Based on the language in Part 1.1, I believe these all these bullets must be addressed and therefore these are "AND" statements.</li> </ol>

Voter	Entity	Segment	Vote	Comment
<p><b>Response:</b> The SDT thanks you for your support. The SDT has made significant clarifying changes to the draft requirements based on comments provided by the industry. The revisions to the draft standard add clarity regarding timeframe. The Time Horizons were modified and changed to “Long-term Planning.”</p> <p>Requirement R1 has been revised and the reformatting addresses your comment.</p>				
Larry D Grimm	Texas Reliability Entity	10	Negative	<p>This FAC-013-2 standard should state that it is not applicable in the ERCOT region. See FERC Order 729, ¶ 298 (see also ¶ 292-293), where FERC states that certain MOD standards should not apply in the ERCOT region. FAC-013 represents an extension of the MOD standards (which relate to calculation of available transfer capability) applied in the planning horizon. Entities in ERCOT should be exempt from FAC-013 for the same reason they are exempt from the MOD standards, because ERCOT does not need to address transmission allocation issues either in the operating horizon or in the planning horizon. To the extent that ERCOT does planning studies to examine transfers, those studies are related more to economic planning than to reliability.</p>
<p><b>Response:</b> Per the NERC Standards Process Manual, “It is the responsibility of the entity that needs a variance to identify that need and initiate the processing of that variance through the submittal of a SAR that includes a clear definition of the basis for the variance.” The SDT cannot take this action on behalf of a region or Interconnection.</p> <p>The concept of transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The standard’s emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values. The SDT believes there is a reliability related need for this assessment to be conducted. The SDT does not believe the TPL standards adequately cover the need at this time.</p>				
Thomas E Washburn	Florida Municipal Power Pool	6	Negative	<p>Unofficial Comment Form for Project 2010-10 - Modifications to FAC-012 and FAC-013 for Order 729 - Draft FAC-013-2 Standard Please DO NOT use this form. Please use the electronic comment form located at the link below to submit comments on the proposed SAR and modifications proposed FAC-013-2 - Planning Transfer Capability. Comments must be submitted by November 3, 2010. If you have questions please contact Darrel Richardson at Darrel.richardson@nerc.net or by telephone at 609-613-1848. <a href="https://www.nerc.net/nercsurvey/Survey.aspx?s=e90004c891d2475ea8f1f74a35d5e2ba">https://www.nerc.net/nercsurvey/Survey.aspx?s=e90004c891d2475ea8f1f74a35d5e2ba</a> Background Information: The SAR for Project 2010-10 - Modifications to FAC-012 and FAC-013 for Order 729 proposes modifications to the following standards: o FAC-012-1 - Transfer Capability Methodology o FAC-013-1 - Establish and Communicate Transfer Capabilities In Order 729, FERC ruled that the ATC standards developed in Project 2006-07 did not completely address the topics covered in FAC-012 and -013 and did not fully address the associated directives from Order 693. Accordingly, FERC denied the portions of the implementation plan that would have retired these standards, and instead</p>

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				<p>directed NERC to use the standards development process to make changes to the FAC standards and file those changes with FERC no later than 60 days prior to the effective date of the standards, which is April 1, 2011 (requiring the proposed changes to be filed on or before January 31, 2011). NERC has an obligation to address FERC's directives. It is the intent to identify all the applicable FERC directives and incorporate them in the draft standard. A second draft of the proposed standard has been developed that attempts to address the applicable FERC directives as well as address concerns raised by the industry during the first posting. Please review the proposed draft standard in its entirety and answer the following questions by using the electronic comment form. You do not have to answer all questions. Enter all comments in Simple Text Format.</p> <ol style="list-style-type: none"> <li>1. The SDT has modified the definition of Planning Transfer Capability (PTC). The definition now reads "The Transfer Capability that is calculated for the planning period beyond 13 months." Do you agree that the revised definition provides additional clarity as to the time period for the calculations? 0 Yes 1 No Comments: It is unclear whether PTC is allegorical to TTC or to ATC. The term should be modified to clarify whether PTC is the total or the incremental available. Without this clarity, on PC might calculate a total whereas its neighboring PC calculate an incremental available value and the numbers will be dramatically different causing confusion. Also, it leaves the values of PTC open to interpretation. FMPA recommends that PTC be calculated as the total; however, the PC should also report the TRM, CBM and existing long term firm commitments assumed so that entities understand that the total may not all be available (e.g., in the PTCMD).</li> <li>2. The SDT has modified the definition of Planning Transfer Capability Implementation Document (PTCID) so that it is now called Planning Transfer Capability Methodology Document (PTCMD). The definition now reads "A document that describes the process for calculating Planning Transfer Capability (PTC)." Do you agree that the revised definition provides additional clarity as to the purpose of the document? 0 Yes 1 No Comments: Mention should be made of the assumptions as well as the process / method</li> <li>3. The SDT has modified the Requirements to include data and modeling information as well as provide for additional clarity regarding the intent of the Requirement. Do you agree that the revised Requirements accomplish</li> </ol>

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				<p>this goal?  0 Yes 1 No Comments: A new sub-requirement should be added that requires listing of existing long term firm point to point transmission service that would consume PTC (assuming PTC is a "total" and not an "available" number).</p> <p>3. The SDT has modified the VRFs to better align with the risk associated with the Requirements. Do you agree that the VRFs are now more consistent with regards to the risk associated with the Requirements?  1 Yes 0 No Comments:</p> <p>4. The SDT has modified the Measures to better align with the Requirements. Do you agree that the Measures are now more consistent with the Requirements?  0 Yes 1 No Comments: M3 and M4 are simply restatements of the requirements. FMPA suggests adding "such as (examples of evidence)" statements similar to those provided in M1, M2 and M5.</p> <p>6. The SDT has modified the VSLs to better align with the severity of non-compliance associated with the Requirements. Do you agree that the VSLs are now more consistent with regards to the severity of non-compliance associated with the Requirements?  1 Yes 0 No Comments:</p> <p>7. When reviewing the mapping document posted with the proposed FAC-013-2 standard, do you believe that the proposed standard (considering only the requirements assigned to the Planning Coordinator) will be lead to an improvement in reliability when compared to the standards it proposes to replace?  1 Yes 0 No</p>
<p><b>Response:</b> The revised standard does not require the calculation of Transfer Capabilities – it requires an assessment of Transfer Capability. The PTC definition has been deleted based on industry comments and the concept of a transfer capability assessment in the Near-Term Planning Horizon has been clarified to avoid confusion and draw distinction from the calculation of ATC/AFC/TTC performed in the operating horizon. The revised standard's emphasis is on assessment of future reliability and facilities that may be impacted by changes in transfers - not specific transfer capability values.</p> <p>Regarding comments 2 through 7 please refer to the response provided in the formal comment form.</p>				