

## **Consideration of Comments on FAC-013-2 — Planning Transfer Capability — Project 2010-10**

The FAC-013-2 — Planning Transfer Capability Drafting Team thanks all commenters who submitted comments on the proposed SAR and modifications proposed FAC-013-2 — Planning Transfer Capability (Project 2010-10). These standards were posted for a 30-day public comment period from December 10, 2010 through January 8, 2011. The stakeholders were asked to provide feedback on the standards through a special Electronic Comment Form. There were 28 sets of comments, including comments from more than 80 different people from approximately 45 companies representing 8 of the 10 Industry Segments as shown in the table on the following pages.

The comments may be reviewed in their original format on the following page:

[http://www.nerc.com/filez/standards/Project2010-10\\_FAC\\_Order\\_729.html](http://www.nerc.com/filez/standards/Project2010-10_FAC_Order_729.html)

### **Based on stakeholder comments, the following changes were made to the standard:**

- The proposed definition of Year One was moved from project 2006-02 – Assess Transmission and Future Needs to this project as the term “Year One” is used in the proposed definition of “Near-Term Transmission Planning Horizon.”
- The Purpose statement was revised to better align with the intent of the requirements
- The qualifying phrase, ‘long-term’ was added to clarify the intent of the scope of planned outages that must be addressed in the Planning Transfer methodology.
- Requirement R2, Part 2.2 was confusing as it linked the request for assessment results and with the distribution of the methodology. The team clarified that the intent of Part 2.2 is related to distribution of the methodology, and added a sentence to Requirement R5 to clarify that the results must be provided to entities that request the results and have a reliability-related need for the information. A sentence was added to clarify that entities do not have to share information that is confidential.
- The VSLs for R1 were clarified, and an error in the VSLs for R2 was corrected.
- The team removed capitalization from the word, “methodology” as this is not a defined term.

### **Minority Issues:**

- Some entities indicated that they disagree with the need for the standard. FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning. The applicability was assigned to the Planning Coordinator because of their generally wider area view and to be in accord with a FERC directive.
- Some entities indicated that WECC has requirements that address the same issue as FAC-013-2 or that the requirements in FAC-013-2 duplicate those in other standards. The SDT recognizes that FAC-013-2 may use the same study work that is used in MOD-029-1; that would not be true for entities that use MOD-028-1 and MOD-030-2. Regardless, the methodologies in the MOD standards DO have a defined date range (the Operations Planning horizon). FAC-013-2 has a different date range (the Near-Term Planning Horizon). Therefore the standards are not duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the study work is

the same study work that is used in MOD-029-1. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The MOD Standards do not afford such flexibility.

- Some entities indicated that the requirements in FAC-013 belong in the TPL standards and the SDT indicated that, in the future, the requirements may be moved.

If you feel that your comment has been overlooked, please let us know immediately. Our goal is to give every comment serious consideration in this process! If you feel there has been an error or omission, you can contact the Vice President and Director of Standards, 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>

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

**Index to Questions, Comments, and Responses**

1. The SDT has defined the term Near-Term Transmission Planning Horizon. The definition reads “The transmission planning period that covers year’s one through five.” (This definition was originally developed by the Assess Transmission Future Needs SDT and has been moved to this project as this project will be completed before the Assess Transmission Future Needs project.) Do you agree that this term provides clarity as to the period the standard applies?..... 9
2. The SDT has modified the Purpose statement. The Purpose statement now reads “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).” Do you agree that the revised Purpose statement provides greater clarity as to what the standard is intended to accomplish?.... 13
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The Industry Segments are:

- 1 — Transmission Owners
- 2 — RTOs, ISOs
- 3 — Load-serving Entities
- 4 — Transmission-dependent Utilities
- 5 — Electric Generators
- 6 — Electricity Brokers, Aggregators, and Marketers
- 7 — Large Electricity End Users
- 8 — Small Electricity End Users
- 9 — Federal, State, Provincial Regulatory or other Government Entities
- 10 — Regional Reliability Organizations, Regional Entities

Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
1.	Group	Guy Zito	Northeast Power Coordinating Council										X
Additional Member	Additional Organization	Region	Segment Selection										
1.	Alan Adamson	New York State Reliability Council, LLC	NPCC	10									
2.	Gregory Campoli	New York Independent System Operator	NPCC	2									
3.	Kurtis Chong	Independent Electricity System Operator	NPCC	2									
4.	Sylvain Clermont	Hydro-Quebec TransEnergie	NPCC	1									
5.	Chris de Graffenried	Consolidated Edison Co. of New York, Inc.	NPCC	1									
6.	Gerry Dunbar	Northeast Power Coordinating Council	NPCC	10									
7.	Dean Ellis	Dynegy Generation	NPCC	5									
8.	Brian Evans-Mongeon	Utility Services	NPCC	8									
9.	Mike Garton	Dominion Resources Services, Inc.	NPCC	5									
10.	Brian L. Gooder	Ontario Power Generation Incorporated	NPCC	5									
11.	Kathleen Goodman	ISO - New England	NPCC	2									
12.	Chantel Haswell	FPL Group, Inc.	NPCC	5									
13.	David Kiguel	Hydro One Networks Inc.	NPCC	1									

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
14.		Michael R. Lombardi	Northeast Utilities	NPCC	1								
15.		Randy MacDonald	New Brunswick System Operator	NPCC	2								
16.		Bruce Metruck	New York Power Authority	NPCC	6								
17.		Lee Pedowicz	Northeast Power Coordinating Council	NPCC	10								
18.		Robert Pellegrini	The United Illuminating Company	NPCC	1								
19.		Si Truc Phan	Hydro-Quebec TransEnergie	NPCC	1								
20.		Saurabh Saksena	National Grid	NPCC	1								
21.		Michael Schiavone	National Grid	NPCC	1								
22.		Peter Yost	Consolidated Edison Co. of New York, Inc.	NPCC	3								
2.	Group	Frank Gaffney	Florida Municipal Power Agency		X		X	X	X	X	X		
Additional Member	Additional Organization	Region	Segment Selection										
1.	Tim Beyrle	Utilities Commission, City of New Smyrna Beach	FRCC	4									
2.	Greg Woessner	Kissimmee Utility Authority	FRCC	3									
3.	Jim Howard	Lakeland Electric	FRCC	3									
4.	Lynne Mila	City of Clewiston	FRCC	3									
5.	Joe Stonecipher	Beaches Energy Services	FRCC	1									
6.	Cairo Vanegas	Fort Pierce Utility Authority	FRCC	4									
7.	Randy Hahn	Ocala Electric Utility	FRCC	3									
3.	Group	Charles W. Long	SERC Planning Standards Subcommittee		X								X
Additional Member	Additional Organization	Region	Segment Selection										
1.	Pat Huntley	SERC Reliability Corporation	SERC	10									
2.	Bob Jones	Southern Company Services	SERC	1									
3.	Darrin Church	Tennessee Valley Authority	SERC	1									
4.	Jim Kelley	PowerSouth Energy Cooperative	SERC	1									
5.	John Sullivan	Ameren Services Company	SERC	1									

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
6.		Phil Kleckley	South Carolina Electric & Gas Co. SERC	1									
4.	Group	Denise Koehn	Bonneville Power Administration	X		X		X	X				
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.		Kyle Kohne	BPA, Transmission Planning WECC	1									
2.		James Randall	BPA, Transmission Planning WECC	1									
3.		Tony Radcliff	BPA, Transmission Planning WECC	1									
5.	Group	Carol Gerou	MRO's NERC Standards Review Subcommittee										X
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Mahmood Safi	Omaha Public Utility District	MRO	1, 3, 5, 6, 10									
2.	Chuck Lawrence	American Transmission Company	MRO	1									
3.	Tom Webb	Wisconsin Public Service Corporation	MRO	3, 4, 5, 6									
4.	Jason Marshall	Midwest ISO Inc.	MRO	2									
5.	Jodi Jenson	Western Area Power Administration	MRO	1, 6									
6.	Ken Goldsmith	Alliant Energy	MRO	4									
7.	Alice Ireland	Xcel Energy	MRO	1, 3, 5, 6									
8.	Dave Rudolph	Basin Electric Power Cooperative	MRO	1, 3, 5, 6									
9.	Eric Ruskamp	Lincoln Electric System	MRO	1, 3, 5, 6									
10.	Joseph Knight	Great River Energy	MRO	1, 3, 5, 6									
11.	Joe DePoorter	Madison Gas & Electric	MRO	3, 4, 5, 6									
12.	Scott Nickels	Rochester Public Utilities	MRO	4									
13.	Terry Harbour	MidAmerican Energy Company	MRO	1, 3, 5, 6									
14.	Richard Burt	Minnkota Power Cooperative, Inc.	MRO	1, 3, 5, 6									
6.	Group	Al DiCaprio	IRC Standards Review Committee		X								
<b>Additional Member</b>		<b>Additional Organization</b>	<b>Region</b>	<b>Segment Selection</b>									
1.	Bill Phillips	Midwest ISO	MRO	2									

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				1	2	3	4	5	6	7	8	9	10
2.	Patrick Brown	PJM	RFC 2										
3.	Jim Castle	NYISO	NPCC 2										
4.	Greg Van Pelt	CAISO	WECC 2										
5.	Charles Yeung	SPP	SPP 2										
6.	Steve Myers	ERCOT	ERCOT 2										
7.	Mark Thompson	AESO	WECC 2										
8.	Ben Li	IESO	NPCC 2										
9.	Matt Goldberg	ISO-NE	NPCC 2										
7.	Individual	Sandra Shaffer	PacifiCorp	X		X		X	X				
8.	Individual	Janet Smith	Arizona Public Service Company	X		X		X	X				
9.	Individual	Steve Rueckert	Western Electricity Coordinating Council										X
10.	Individual	Ross Kovacs	Georgia Transmission Corporation	X									
11.	Individual	Joe Petaski	Manitoba Hydro	X		X		X	X				
12.	Individual	Jonathan Appelbaum	United Illuminating Co.	X									
13.	Individual	Kathleen Goodman	ISO New England, Inc.		X								
14.	Individual	Aaron Staley	Orlando Utilities Commission	X									
15.	Individual	Thad Ness	American Electric Power	X		X		X	X				
16.	Individual	Kirit Shah	Ameren	X		X		X	X				
17.	Individual	Greg Rowland	Duke Energy	X		X		X	X				

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Group/Individual		Commenter	Organization	Registered Ballot Body Segment									
				1	2	3	4	5	6	7	8	9	10
18.	Individual	Chris de Graffenried	Consolidated Edison Co. of NY, Inc.	X		X		X	X				
19.	Individual	Bill Middaugh	Tri-State Generation & Transmission Assn., Inc.	X	X								
20.	Individual	JC Culberson	ERCOT										
21.	Individual	RoLynda Shumpert	South Carolina Electric and Gas	X		X		X	X				
22.	Individual	Alice Ireland	Xcel Energy	X		X		X	X				
23.	Individual	Gregory Campoli	New York Independent System Operator		X								
24.	Individual	Andrew Z. Pusztai	American Transmission Company	X									
25.	Individual	John Tolo	Tucson Electric Power	X									
26.	Individual	Dan Rochester	Independent Electricity System Operator		X								
27.	Individual	Janelle Marriott	Tri-State Generation and Transmission Assn., Inc.	X		X		X					
28.	Individual	Dennis Chastain	Tennessee Valley Authority	X		X		X	X				



1. The SDT has defined the term Near-Term Transmission Planning Horizon. The definition reads “The transmission planning period that covers year’s one through five.” (This definition was originally developed by the Assess Transmission Future Needs SDT and has been moved to this project as this project will be completed before the Assess Transmission Future Needs project.) Do you agree that this term provides clarity as to the period the standard applies?

**Summary Consideration:** While most commenters indicated that the proposed definition did add clarity, some indicated that the definition includes a draft defined term, “Year One” and asked that the defined term, “Year One” be added to this project and this was done. Adoption of both the Near-Term Transmission Planning Horizon definition and the Year One definition from the TPL-001-2 standard development project will clearly define the assessment period addressed in FAC-013-2.

**Near-Term Transmission Planning Horizon:** The transmission planning period that covers years one through five.

**Year One:** The first twelve month period that a Planning Coordinator or a Transmission Planner is responsible for assessing. For the Planning Assessment started in a given calendar year, Year One includes the forecasted peak Load period for one of the following two calendar years. For example, if a Planning Assessment was started in 2011, then Year One includes the forecasted peak Load period for either 2012 or 2013.

Organization	Yes or No	Question 1 Comment
Florida Municipal Power Agency	No	Is year one the current year or the next year, e.g., doing a study in 2011, is year one 2011 or 2012?
<p><b>Response:</b> The definition of Year One from the <b>draft</b> TPL-001-2 standard, which is used in the Near-Term Transmission Planning Horizon definition, will also be adopted in this standard which clarifies the assessment period.</p>		
Ameren	No	As one of the benefits of transfer capability testing and analysis is tracking/trending, does a definition also need to be developed for Long-Term Transmission Planning Horizon? This would allow comparison of transfer capabilities in the near-term as well as long-term planning horizons.
<p><b>Response:</b> The standard is not intended to require assessment of Transfer Capability beyond the Near-Term Transmission Planning Horizon. Therefore the Long-Term Transmission Planning Horizon definition is not required.</p>		
Northeast Power Coordinating Council	No	The definition is not clear as to when year one starts. Suggest rewording to: “The transmission planning period that covers the period of 12 to 60 months from the date of the assessment.”
Consolidated Edison Co. of NY,	No	

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Organization	Yes or No	Question 1 Comment
Inc.		
New York Independent System Operator	No	
ISO New England, Inc.	No	
<p><b>Response:</b> The definition of Year One from the TPL-001-2 standard, which is used in the Near-Term Transmission Planning Horizon definition, will also be adopted in this standard which clarifies the assessment period.</p>		
IRC Standards Review Committee	No	<p><b>There still is some confusion regarding when year one starts. We assume that year one is intended to start at 12 months. If this is the case, the definition should be made clear that years one through five cover the time frame from 12 to 60 months.</b></p>
<p><b>Response:</b> The definition of Year One from the TPL-001-2 standard, which is used in the Near-Term Transmission Planning Horizon definition, will also be adopted in this standard which clarifies the assessment period.</p>		
Tucson Electric Power	No	<p>Previously there was an Operating Horizon (Year 1) and a Planning Horizon (Year 2 through 10). would there then be an overlap with the Operating Horizon (Year1) and the first year of the Near-Term Transmission Planning Horizon. What is the distinction between the Near-Term and Long-Term Planning Horizon?</p>
<p><b>Response:</b> There are other terms utilized in the standards process that delineate time frames. The only one relevant to the FAC-013-2 standard is the Near-Term Transmission Planning Horizon. Some overlap with other terms should not be a problem. TPL-001-2 introduces the Long-Term Transmission Planning Horizon definition and provides a clear distinction from the Near-Term Transmission Planning Horizon.</p>		
Bonneville Power Administration	Yes	<p>The term provides clarity to the time period the standard applies to. However, the Near-Term Transmission Planning Horizon is already defined in the TPL-001 R1.2.</p>
<p><b>Response:</b> The FAC-013 standard will be approved before TPL-001-2 and will be used to introduce the new Near-Term Transmission Planning definition and Year One definition.</p>		
Western Electricity Coordinating Council	Yes	<p>Procedurally, if this definition is approved in FAC-013-2 before TPL-001-1 is finalized, will the definition be removed from the TPL-001-1 section of new terms since it will already be an approved term?</p>
<p><b>Response:</b> Yes</p>		

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Organization	Yes or No	Question 1 Comment
Duke Energy	Yes	However adoption of the Near-Term Transmission Planning Horizon definition from the TPL-001-2 standard development will also require adoption of the definition of Year One which is part of the Near-Term Transmission Planning Horizon definition.
<p><b>Response:</b> The definition of Year One from the TPL-001-2 standard, which is used in the Near-Term Transmission Planning Horizon definition, will also be adopted in this standard which clarifies the assessment period.</p>		
SERC Planning Standards Subcommittee	Yes	
MRO's NERC Standards Review Subcommittee	Yes	
PacifiCorp	Yes	
Arizona Public Service Company	Yes	
Georgia Transmission Corporation	Yes	
Manitoba Hydro	Yes	
United Illuminating Co.	Yes	
Orlando Utilities Commission	Yes	
American Electric Power	Yes	
Tri-State Generation & Transmission Assn., Inc.	Yes	
ERCOT	Yes	
South Carolina Electric and Gas	Yes	

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Organization	Yes or No	Question 1 Comment
Xcel Energy	Yes	
American Transmission Company	Yes	
Independent Electricity System Operator	Yes	
Tri-State Generation and Transmission Assn., Inc.	Yes	
Tennessee Valley Authority	Yes	

2. The SDT has modified the Purpose statement. The Purpose statement now reads “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).” Do you agree that the revised Purpose statement provides greater clarity as to what the standard is intended to accomplish?

**Summary Considerations:** While many commenters agreed with the revised purpose statement, several commenters recommended a modification to better align the purpose with the requirements. To further align the purpose statement with the content of the standard, it has been revised to “To ensure that Planning Coordinators have a methodology for, and perform an annual assessment to identify potential future Transmission System weaknesses and limiting facilities that could impact the Bulk Electric System’s (BES) ability to reliably transfer energy in the Near-Term Transmission Planning Horizon.”

Several comments indicate that the standard is either duplicative or unnecessary for reliable planning. FERC Order 729 addressed these issues and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.

Some commenters indicated that, as written, R4 could possibly allow the Planning Coordinator to conduct an assessment based on a simulation that has not been updated. The intent is to require a simulation to be performed each calendar year and assessment conducted based on that simulation. To clarify this intent, R4 has been reworded as follows: “During each calendar year, each Planning Coordinator shall conduct simulations and document an assessment based on those simulations in accordance with its transfer capability methodology for at least one year in the Near-Term Transmission Planning Horizon.”

Organization	Yes or No	Question 2 Comment
ISO New England, Inc.		The statement adds clarity; however the revised standard does not serve this purpose. Knowing the transfer limit does not assess the reliability of the BES. The TPLs are the standards which will determine BES reliability through demonstration of system’s ability to serve load through the capability of the transmission system and internal resources.
<p><b>Response:</b> The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers rather than the specific values. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,..) and understanding the potential impact on facilities, (and thus reliability), is important to effective transmission planning. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p>		

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Organization	Yes or No	Question 2 Comment
<p>FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.</p>		
Northeast Power Coordinating Council	No	<p>The statement adds clarity; however the revised standard does not serve this purpose. Knowing the transfer limit does not assess the reliability of the BES. The Transmission Planning Standards (TPL) are the standards which will determine BES reliability by demonstrating a system’s ability to serve load through the capability of the transmission system and internal resources.</p>
Consolidated Edison Co. of NY, Inc.	No	
<p><b>Response:</b> The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers, rather than the specific values. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,..) and understanding the potential impact on facilities, (and thus reliability), is important to effective transmission planning. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p>		
<p>FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.</p>		
New York Independent System Operator	No	<p>The statement adds clarity; however the revised standard does not serve this purpose. Knowing the transfer limit does not assess the reliability of the BES. The TPLs are the standards which will determine BES reliability through demonstration of system’s ability to serve load through the capability of the transmission system and internal resources.</p> <p>There are no TPL standards that require system expansion for maintenance of transfer capabilities above firm transfer commitments, therefore transfer capabilities in the planning horizon provide no additional information that can be used for reliability planning.</p>
<p><b>Response:</b> The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers, rather than the specific values. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,..) and understanding the potential impact on facilities, (and thus reliability), is important to effective transmission planning. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p>		
<p>FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the</p>		

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Organization	Yes or No	Question 2 Comment
benefit to reliable transmission system planning.		
Bonneville Power Administration	No	<p>BPA is still recommending a "no" vote because of the conflict between the purpose statement and the title of the standard, as well as the concern regarding the potential for double jeopardy given our belief that the requirements of the proposed FAC-013-2 are duplicative with other standards.</p> <p>BPA believes it would be more appropriate to incorporate the annual assessment and reporting time-line requirements stated in the proposed standard into the appropriate section of FAC-010, FAC-014, and the TPL Planning Standards. If this assessment is for reliability, it will be conducted using power flow stability programs, etc. These programs do not assess anything based on "energy". Perhaps it should be "power" instead.</p> <p>The condition that the development of the transfer capabilities (as requested by the RRO or Regional Entity) was deleted from this version. We understand that the SDT tries to codify what would be done; however, it will still require that an annual assessment be done. Theoretically, we can use the Assessment Studies required in the TPL standards. As written, we are not certain that we can use FAC-010-2 and FAC-014-2 results to comply with this proposed FAC-013-2.</p> <p>Additionally, why is Applicability applied to Planning Coordinators and not the Transmission Planner?</p>
<p><b>Response:</b> The SDT is not certain of the conflict BPA notes but the Purpose has been modified to better align with the content of the standard. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. FAC-010-2 and FAC-014-2 do not afford such flexibility.</p> <p>The applicability was assigned to the Planning Coordinator because of their generally wider area view and to be in accord with a FERC directive.</p> <p>The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. With regard to double jeopardy, the methodology in FAC-013-2 has a different date range (the Near-Term Planning Horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the effort is the same work that is used in other standards.</p>		
MRO's NERC Standards Review Subcommittee	No	<p>The existing Reliability Standards that apply for the Near-Term Planning Horizon (e.g. TPLs) require the identification of potential future weaknesses and limiting Facilities that could impact reliability of the BES for firm transfer commitments, not transfer capabilities beyond the firm transfer commitments. The assessment of transfer capabilities beyond the firm transfer commitments in the Near-Term Planning Horizon would identify economic non-transfer opportunities that exist with the future planned transmission system and possible system expansion or improvements that could increase economic non-firm transfer opportunities. Therefore, this purpose is appropriate for an open access, economic type of standard, not a transmission system Reliability Standard.</p>
American Transmission Company	No	

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Organization	Yes or No	Question 2 Comment
		<p>The purpose statement should assign the applicability of this standard to the Transmission Service Provider function and not the Planning Coordinator since this standard deals with identifying non-firm transfer capabilities. Therefore, the applicability should be changed from Planning Coordinator to Transmission Service Provider throughout this standard. Otherwise, perhaps the FAC-013-2 standard should be converted to an appropriate open access, economic (e.g. NAESB) standard.</p>
<p><b>Response:</b> The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers, rather than the specific values. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,...) and understanding the potential impact on facilities, (and thus reliability), is important to effective transmission planning. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p> <p>FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning. The applicability was assigned to the Planning Coordinator because of their generally wider area view and to be in accord with a FERC directive.</p>		
<p>IRC Standards Review Committee</p>	<p>No</p>	<p>While the standard represents an improvement by allowing the transfer capability to be calculated in year 1 and not years 2-5, we still generally disagree with the purpose. Transfer capabilities in the planning horizon are not useful for the reliable planning of the transmission system and/or any expansion plans. The current, approved TPL standards already provide system expansion requirements to assure reliable system performance with regard to firm transfer commitments, but not to limits that may exceed those firm commitments such as those that would be indicated in PTC calculations. Further, it must be noted that there are no TPL standards that require system expansion for maintenance of transfer capabilities above firm transfer commitments. As such, transfer capabilities in the planning horizon provide no additional information that can be used for system planning.</p> <p>In addition, transfer capabilities calculated 2 to 5 years ahead are not useful to give system operators advance warning or appropriate, applicable operating limits because operating horizon conditions will be significantly different than those projected during the planning horizon (2 to 5 years previously). IESO does not support the response to this question.</p>
<p><b>Response:</b> The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers, rather than the specific values. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,...) and understanding the potential impact on facilities, (and thus reliability), is important to effective transmission planning. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p>		



Consideration of Comments on FAC-013-2 — Planning Transfer Capability — Project 2010-10

Organization	Yes or No	Question 2 Comment
<p>FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.</p>		
ERCOT	No	<p>Transfer capabilities in the planning horizon are not useful for the reliable planning of the transmission system and/or any expansion plans. The current, approved TPL standards already provide system expansion requirements to assure reliable system performance with regard to firm transfer commitments, but not to limits that may exceed those firm commitments such as those that would be indicated in PTC calculations. Further, it must be noted that there are no TPL standards that require system expansion for maintenance of transfer capabilities above firm transfer commitments. As such, transfer capabilities in the planning horizon provide no additional information that can be used for system planning. In addition, transfer capabilities calculated 2 to 5 years ahead are not useful to give system operators advance warning or appropriate, applicable operating limits because operating horizon conditions will be significantly different than those projected during the planning horizon (2 to 5 years previously).</p>
<p><b>Response:</b> The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers rather than the specific values. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,..) and understanding the potential impact on facilities, (and thus reliability), is important to effective transmission planning. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p>		
<p>FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.</p>		
Arizona Public Service Company	No	<p>It is not clear if an entity would have to perform yearly TTC studies for all paths or whether an entity could access each path yearly and determine if a need existed for a restudy of the TTC for a particular path.</p>
<p><b>Response:</b> As written, R4 could possibly allow the Planning Coordinator to conduct an assessment based on a simulation that has not been updated. The intent is to require a simulation to be performed each calendar year and assessment conducted based on that simulation. To clarify this intent, R4 has been reworded as follows: “During each calendar year, each Planning Coordinator shall conduct simulations and document an assessment based on those simulations in accordance with its transfer capability methodology for at least one year in the Near-Term Transmission Planning Horizon.”</p>		
Western Electricity Coordinating Council		<p>The current title is Assessment of Transfer Capability..., but the Purpose statement identifies that the purpose is to perform and annual assessment of , the ability to transfer energy. If this assessment is for reliability, it will be conducted using power flow and stability programs. These programs to not assess anything based on</p>

Consideration of Comments on FAC-013-2 — Planning Transfer Capability — Project 2010-10

Organization	Yes or No	Question 2 Comment
		energy. Would it be more appropriate to use "power" instead of "energy" in the purpose statement?
<p><b>Response:</b> To further align the purpose statement with the content of the standard, it has been revised to “To ensure that Planning Coordinators have a methodology for, and perform an annual assessment to identify potential future Transmission System weaknesses and limiting facilities that could impact the Bulk Electric System’s (BES) ability to reliably transfer energy in the Near-Term Transmission Planning Horizon.” The SDT see does not believe changing energy to power would add any additional clarity to the standard.</p>		
United Illuminating Co.	No	<p>UI disagrees. The purpose is to establish a methodology and apply the methodology to determine the transfer capability. The Standard is not addressing the identification of weaknesses or impact to BES reliability. The assessment of the impact of the transfer capabilities determined by FAC-013 is made in the Transmission Planning Process (TPL standards). The proper purpose statement is: “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).”</p>
<p><b>Response:</b> The purpose of the standard is to focus more on the limiting facilities that are identified under the stress of specific energy transfers, rather than the specific values. Changes in energy transfers can occur for a variety of reasons (change in resource plans, changes in energy costs, new generation sources,...) and understanding the potential impact on facilities, (and thus reliability), is important to effective transmission planning. The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p> <p>FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.</p>		
Ameren	No	<p>As we all know, transfer capability is not a single value and is dependent on the selection and participation of sources and sinks on the defined transmission system. A multitude of assumptions goes into the development of the power system model, and the transfer capability study/assessment assumptions need to be discussed and documented.</p>
<p><b>Response:</b> The SDT agrees and R1 is intended to ensure that documentation of assumptions and criteria is provided in the transfer capability methodology.</p>		
Tucson Electric Power	No	<p>The meaning of Energy Transfers is not clear. Need a clear definition of what is meant by "ability to transfer energy". We currently conduct Planning Horizon (Year 2 through 10) LSC reliability studies to serve Native and Network Customer loads, while meeting TPL standards. I do not believe it is reasonable to ask individual BAs to determine transmission network transfer capability since it would inevitably involve multiple-BAs systems. Perhaps this is a role for the WECC Regional Transmission Expansion Plan developers.</p>

Consideration of Comments on FAC-013-2 — Planning Transfer Capability — Project 2010-10

Organization	Yes or No	Question 2 Comment
<p><b>Response:</b> The focus of the standard is on identifying limiting facilities under the stress of increased transfers. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment of impact of transfers on reliability according to their knowledge of the behavior and needs of their system.</p> <p>The applicability was assigned to the PC because of their generally wider area view and to be in accord with a FERC directive.</p>		
Florida Municipal Power Agency	Yes	
SERC Planning Standards Subcommittee	Yes	
PacifiCorp	Yes	
Georgia Transmission Corporation	Yes	
Manitoba Hydro	Yes	
Orlando Utilities Commission	Yes	
American Electric Power	Yes	
Duke Energy	Yes	
Tri-State Generation & Transmission Assn., Inc.	Yes	
South Carolina Electric and Gas	Yes	
Xcel Energy	Yes	
Independent Electricity System Operator	Yes	
Tri-State Generation and	Yes	

Consideration of Comments on FAC-013-2 — Planning Transfer Capability — Project 2010-10

Organization	Yes or No	Question 2 Comment
Transmission Assn., Inc.		
Tennessee Valley Authority	Yes	

**3. The SDT has added a Requirement R6. The Requirement R6 reads “If a recipient of a documented Transfer Capability assessment requests data to support the assessment, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request.” Do you agree that the Requirement is necessary for verification of the assessment?**

**Summary Consideration:** Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as, “If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator’s area regarding the disclosure of confidential and/or sensitive information.”

The SDT believes the 45 calendar day deadline is appropriate for providing data that the Planning Coordinator used in the assessment and would reasonably be expected to be readily available.

The standard does not address the format in which data must be provided, but it is reasonable to assume that it would be in the form the Planning Coordinator used for the studies. It would not be reasonable to place the burden on the Planning Coordinator for providing the data in all the formats that requestors may desire

Organization	Yes or No	Question 3 Comment
Northeast Power Coordinating Council	No	This requirement states that the Planning Coordinator provide the data to support the assessment results upon request. Such entities may be restricted from receiving such data as it may be CEII, market sensitive data, or violate other Planning Coordinator policies.
ISO New England, Inc.	No	
Consolidated Edison Co. of NY, Inc.	No	
<p><b>Response:</b> Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as “If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator’s area regarding the disclosure of confidential and/or sensitive information.”</p>		
Florida Municipal Power Agency	No	Please see response to Question 5

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Organization	Yes or No	Question 3 Comment
<p><b>Response:</b> Please see response to question 5.</p>		
SERC Planning Standards Subcommittee	No	It should be made clear that providing CEII data would not be included in this requirement.
<p><b>Response:</b> Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as “If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator’s area regarding the disclosure of confidential and/or sensitive information.”</p>		
MRO's NERC Standards Review Subcommittee	No	Requirement R6 does not serve a transmission system reliability purpose and should be removed. The FAC-013-2 standard should be converted to an appropriate open access, economic (e.g. NAESB) standard.
American Transmission Company	No	Requirement R6 does not serve a transmission system reliability purpose and should be removed, unless the FAC-013-2 standard is converted an appropriate open access, economic (e.g. NAESB) standard
<p><b>Response:</b> R6 serves a reliability purpose; it provides sufficient data for those entities with a reliability related need to verify data and assumptions, and to validate assessments.</p>		
IRC Standards Review Committee	No	<p>R6 is an unnecessary administrative requirement that provides no reliability benefit. It attempts to implement the open access concepts of transparency and comparability by allowing a third party to repeat or mimic the Planning Coordinator’s calculations. It is strictly a commercial issue and simply does not belong in enforceable reliability standards. Further, it presumes that the Planning Coordinator is not able to perform its function and that compliance monitoring and enforcement processes of NERC and the Regional Entities will not detect deficiencies which will result in mitigation plans to correct deficiencies. Furthermore, some entities simply cannot have the data without violating FERC standards of conduct and data confidentiality policies.</p>
ERCOT	No	
<p><b>Response:</b> The SDT does not believe that R6 is an unnecessary administrative requirement and it does provide reliability benefits. R6 serves a reliability purpose; it provides sufficient data for those entities with a reliability related need to verify data and assumptions, and to validate assessments. R6 does not presume that the Planning Coordinator may not be capable of performing the function nor does it presume NERC and Regional Entities’ Compliance Monitoring and Enforcement Processes will not be able to identify deficiencies and will not be able to direct mitigation plans to correct those deficiencies. It does presume that NERC registered functional entities will be provided greater transparency of the data, assumptions and assessments.</p> <p>Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as “If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar</p>		

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Organization	Yes or No	Question 3 Comment
<p>days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator's area regarding the disclosure of confidential and/or sensitive information."</p>		
<p>Independent Electricity System Operator</p>	<p>No</p>	<p>While the IESO generally supports the underlying rationale for Requirement R6, it must be further revised to respect the reality of there being differing (and potentially conflicting) data confidentiality provisions and regulatory environments across North America. The IESO recommends that an additional statement be added to Requirement R6, to the following effect: "Upon receiving a request by a recipient of a documented Transfer Capability assessment for data in support the assessment, a Planning Coordinator shall provide the requestor with such data within 45 calendar days. Notwithstanding the foregoing sentence, the provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator's area regarding the disclosure of confidential and/or sensitive information."</p>
<p><b>Response:</b> Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as "If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator's area regarding the disclosure of confidential and/or sensitive information."</p>		
<p>New York Independent System Operator</p>	<p>No</p>	<p>This is an unnecessary administrative requirement that provides no reliability benefit and presumes that the Planning Coordinator is not able to perform its function. Furthermore, this requirement does not recognize that recipients of the Transfer Capability assessment may be restricted from receiving the assessment data as the data may be CEII or confidential.</p>
<p><b>Response:</b> R6 serves a reliability purpose; it provides sufficient data for those entities with a reliability related need to verify data and assumptions and to validate assessments.</p>		
<p>Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as "If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator's area regarding the disclosure of confidential and/or sensitive information."</p>		
<p>Tennessee Valley Authority</p>	<p>No</p>	<p>The intent of this requirement is unclear. To understand who is intended by the phrase "recipient of a documented Transfer Capability assessment", one must trace back to R5, and then R2 to understand that it is referring to 1) each adjacent Planning Coordinator, 2) each Transmission Planner within the Planning Coordinator's Planning Coordinator area, and 3) each other functional entity that has a reliability-related need and has made a written request for the applicable Planning Coordinator's assessment of Transfer Capabilities. No bounds are defined for the scope of "data" these entities may request. Some of the data may be considered CEII, and the timeline for release of such information should be taken into consideration if non-disclosure agreements are not already in place with the potential requestors.</p>

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Organization	Yes or No	Question 3 Comment
<p><b>Response:</b> R6 serves a reliability purpose; it provides sufficient data for those entities with a reliability related need to verify data and assumptions and to validate assessments.</p> <p>Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as “If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator’s area regarding the disclosure of confidential and/or sensitive information.”</p>		
Tucson Electric Power	No	
PacifiCorp	Yes	<p>Providing the requested data within 45 days is sufficient if the format of the data provided by the Planning Coordinator may be in the software format currently in use by the entity developing such data, although 60 days would be more reasonable. Additional time would be required if a general use format is necessary. Also, all rights to the data would remain with the originating registered entity and further disclosure by any recipients would be in violation of existing non-disclosure agreements.</p>
<p><b>Response:</b> The SDT believes the 45 calendar day deadline is appropriate for providing data that the Planning Coordinator used in the assessment and would reasonably be expected to be readily available.</p> <p>The standard does not address the format in which data must be provided, but it is reasonable to assume that it would be in the form the Planning Coordinator used for the studies. It would not be reasonable to place the burden on the Planning Coordinator for providing the data in all the formats that requestors may desire.</p> <p>Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as “If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator’s area regarding the disclosure of confidential and/or sensitive information.”</p>		
Bonneville Power Administration	Yes	<p>The requirement is necessary for the verification of the assessment. However, is the 45 calendar days deadline necessary? FAC-014-2, Requirement R5 has similar language, but does not have a dead-line specified for responding. Also, the TPL-001 thru TPL-004 do not have specified time-lines for responding.</p>
<p><b>Response:</b> The SDT believes the 45 calendar day deadline is appropriate for providing data that the Planning Coordinator used in the assessment and would reasonably be expected to be readily available. It is also necessary for establishing appropriate compliance criteria.</p>		



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Organization	Yes or No	Question 3 Comment
Orlando Utilities Commission	Yes	Is the intent of R6 limited to a recipient requesting the same data used to make the assessment such that given the same software they could repeat the analysis? If so I would suggest wording as "...requests the data used to make the assessment, the Planning Coordinator shall provide such data to that entity in the formats used or another format agreeable to both parties." As written it could result in wider requests for data and/or requests for data in a format other than that used for the study.
<p><b>Response:</b> The standard does not address the format in which data must be provided, but it is reasonable to assume that it would be in the form the Planning Coordinator used for the studies. It would not be reasonable to place the burden on the Planning Coordinator for providing the data in all the formats that requestors may desire.</p>		
South Carolina Electric and Gas	Yes	It should be made clear that providing CEII data would not be included in this requirement.
<p><b>Response:</b> Because of concerns regarding restrictions on dissemination of CEII and commercially sensitive information, R6 has been reworded as "If a recipient of a documented Transfer Capability assessment requests data to support the assessment results, the Planning Coordinator shall provide such data to that entity within 45 calendar days of receipt of the request. The provision of such data shall be subject to the legal and regulatory obligations of the Planning Coordinator's area regarding the disclosure of confidential and/or sensitive information"</p>		
Arizona Public Service Company	Yes	
Georgia Transmission Corporation	Yes	
Manitoba Hydro	Yes	
United Illuminating Co.	Yes	
American Electric Power	Yes	
Duke Energy	Yes	
Tri-State Generation & Transmission Assn., Inc.	Yes	

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Organization	Yes or No	Question 3 Comment
Xcel Energy	Yes	
Tri-State Generation and Transmission Assn., Inc.	Yes	

**4. The SDT has modified the VSLs to better align with the Requirements. Do you agree that the revised VSLs are now appropriately aligned with the Requirements?**

**Summary Consideration:** Comments were received indicating the VSL’s for R1 are incorrect. The SDT believes the existing VSLs are correct and logical and follow NERC’s guidance on VSL’s for requirements with parts that contribute unequally to the requirement: If a requirement has several parts, and the parts contribute unequally to the reliability-related objective of the requirement, then noncompliance with each of the parts should be clearly associated with at least one of the VSLs. Missing one or two parts of R1.4 is not as significant as missing all of 1.1, 1.2, 1.3. or 1.5. The VSL’s for R1 have also been edited to read more clearly. The VSL’s for R2 were incorrect and have been revised.

Organization	Yes or No	Question 4 Comment
MRO's NERC Standards Review Subcommittee	No	Missing one of the parts 1.1, 1.2, 1.3 or 1.5 is a Moderate VSL while missing only part of 1.4 is a Lower VSL. This implies that missing one of the parts 1.1, 1.2, 1.3 or 1.5 is deemed to have missed a greater part of the requirement as a whole rather than missing part of 1.4. We disagree and, thus, recommend that the VSLs for missing one of 1.1, 1.2, 1.3 or 1.5 should start at a Lower VSL and increment to the next VSL for each successive missing part.
ERCOT	No	
<p><b>Response:</b> The SDT believes the existing VSLs are correct and logical and follow NERC’s guidance on VSL’s for requirements with parts that contribute unequally to the requirement: If a requirement has several parts, and the parts contribute unequally to the reliability-related objective of the requirement, then noncompliance with each of the parts should be clearly associated with at least one of the VSLs. Missing one or two parts of R1.4 is not as significant as missing all of 1.1, 1.2, 1.3. or 1.5.</p>		
IRC Standards Review Committee	No	Missing one of the parts 1.1, 1.2, 1.3 or 1.5 is a Moderate VSL while missing only part of 1.4 is a Lower VSL. This implies that missing one of the parts 1.1, 1.2, 1.3 or 1.5 are deemed to have missed a greater part of the requirement as a whole than missing part of 1.4. We disagree and, thus, recommend that the VSLs for missing one of 1.1, 1.2, 1.3 or 1.5 should start at a Lower VSL and increment to the next VSL for each successive missing part. AESO does not comment on VSLs as they are established by regulatory authorities in Alberta.
<p><b>Response:</b> The SDT believes the existing VSLs are correct and logical and follow NERC’s guidance on VSL’s for requirements with parts that contribute unequally to the requirement: If a requirement has several parts, and the parts contribute unequally to the reliability-related objective of the requirement, then noncompliance with each of the parts should be clearly associated with at least one of the VSLs. Missing one or two parts of R1.4 is not as significant as missing all of 1.1, 1.2, 1.3. or 1.5.</p>		
Duke Energy	No	The VSLs for R2 are incorrect. The paragraph after the “OR” in the Lower VSL is not a violation. To correct

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Organization	Yes or No	Question 4 Comment
		this, replace the paragraph after the “OR” in the Lower VSL with the corresponding paragraph from Moderate. Likewise, move the paragraph after the “OR” in Higher to Moderate. Also, modify the paragraph after the “OR” in High to make it 90 to 120 days. Then add a new paragraph after the “OR” in Severe, making it more than 120 days after receipt of a request.
<p><b>Response:</b> The SDT agrees and has made the suggested changes.</p>		
Tri-State Generation & Transmission Assn., Inc.	No	Tri-State believes that the intent of the R1. VSL is that a failure to incorporate the number specified in the level of the requirements R1.1, R1.2, R1.3, or R1.5 requires that the word “and” be changed to “or” in the Moderate, High, and Severe VSLs. The Moderate, High, and Severe levels use the term “Planning Transfer Methodology” instead of “Transfer Capability Methodology” in the last section of each of those VSLs for R1. The “OR” clause in each of the Severe VSLs of R3., R4., R5., and R6. is unnecessary and should be removed. The only time the clause would be in effect is if an audit occurred while the non-compliance period was ongoing and the VSLs as proposed would require a Severe level for as little as a single day’s non-compliance.
<p><b>Response:</b> The SDT modified the standard to read “The Planning Coordinator has a planning transfer capability methodology, but failed to incorporate one of the following Parts of Requirement R1 into that methodology:</p> <ul style="list-style-type: none"> <li>• Part 1.1</li> <li>• Part 1.2</li> <li>• Part 1.3</li> <li>• Part 1.5</li> </ul> <p>With respect to the second part of your concern - the Severe VSL was intended to address the situation where the PC has no evidence of having tried to meet the requirement.</p>		
Independent Electricity System Operator	No	We do not have any concerns with the revised VSLs but caution that they may need to be revised depending on the SDT’s response to our comments under Q3 and Q5, and any other industry comments.
<p><b>Response:</b> The VSL's have been corrected to use the correct term for Transfer Capability methodology.</p>		
Bonneville Power Administration	Yes	The new VSLs are appropriately aligned with the Requirements.
Western Electricity Coordinating Council	Yes	Thank you for addressing the issue with the Low and Moderate VSL for R1.

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Organization	Yes or No	Question 4 Comment
<b>Response:</b> Thank you		
Northeast Power Coordinating Council	Yes	
Florida Municipal Power Agency	Yes	
PacifiCorp	Yes	
Arizona Public Service Company	Yes	
Georgia Transmission Corporation	Yes	
Manitoba Hydro	Yes	
United Illuminating Co.	Yes	
Orlando Utilities Commission	Yes	
American Electric Power	Yes	
Consolidated Edison Co. of NY, Inc.	Yes	
South Carolina Electric and Gas	Yes	
American Transmission Company	Yes	
Tucson Electric Power	Yes	

**5. Please provide any other comments (that you have not already provided in response to the questions above) that you have on the proposed standard.**

**Summary Consideration:** Based on industry feedback, the SDT has made several wording changes to add clarity to requirements.

For Requirement R1, Part 1.4.1 ad 1.4.2, the term, “long-term” was added to qualify the types of outages that must be considered.

For clarity, Requirement R2, Part 2.2 was rephrased to clearly address distribution of the methodology, and to Requirement R5, to require providing entities with a reliability-related need for the assessment results with those results.

Commenters identified that the term “Transfer Capability Methodology” is capitalized, implying that this is a defined term but this term is neither defined in the NERC Glossary nor being proposed in the standard as a new term. The SDT has modified the draft standard to use the lower-case lettering for the term “Transfer Capability methodology”.

Organization	Yes or No	Question 5 Comment
Northeast Power Coordinating Council	Yes	R1.1 - This requirement is unclear as written. Using the term “transfers” suggests that the values are known at the initiation of the study. “Transfers” be replaced with “interfaces” to become “Criteria for the selection of the interfaces to be assessed.”R1.2 - The intent of this requirement is unclear. If the point of this effort is to determine transfer limits in a planning space, why would the analysis “respect” known SOLs. More confusion is added if the system being analyzed contains transmission upgrades which are not reflected in current known SOLs. This should be deleted, or consider revision to read: “A statement that the assessment shall consider for evaluation known system operating limits (SOLs)”. The term “respect” implies that known SOLs will be adhered to without the benefit of needed periodic re-evaluation. In the planning, as well as real-time operation, SOLs are dynamic, and may change as a result of system topography/operational changes.
Consolidated Edison Co. of NY, Inc.	Yes	<p>R1.3 - Revise to read “A statement that the assumptions and criteria used to perform the assessment are consistent with the Planning Coordinator’s planning criteria.” Planning practices should always reflect current planning criteria.</p> <p>R1.4.1 - Revise to read “Generation dispatch, including but not limited to long term planned outages, additions and retirements.”</p> <p>R1.4.2 - Revise to read “Transmission System topology, including but not limited to long term planned outages; transmission additions, upgrades and retirements.”</p> <p>R1.4.3 - Revise to read “System demand, including peak demand”. Transfer limits at peak load are used in many Reliability Coordinator reliability assessments.</p>

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Organization	Yes or No	Question 5 Comment
		<p>R1.4.4 - Revise to read “Current approved Firm Transmission uses”. Only approved firm transmission service should be embedded in the base case (i.e. not subject to periodic assessments) because it is reasonable to expect that these types of transfers have received formal approval after a comprehensive evaluation. Any other type of transfers may not be thought of being inconsequential to reliability until an evaluation is performed. It is also unclear what the meaning of “uses” is in this context.</p> <p>R1.4.5 - What it is meant by “parallel path loop flow adjustment”? Provide an illustrative example, and it should be added as a definition and to the NERC Glossary.</p> <p>R1.5 - This requirement should be revised to specify that simulations of transfers are performed mainly through the adjustment of generation only, not load. Changing the dispatch of generation resources is, in the vast majority of cases, the way that transfers are effected in real-time, and simulations should reflect this fact. The use of Phase Angle Regulators must also be considered, and the Requirement worded to reflect the use of that equipment.</p> <p>R3 - There should be a time limit with respect to when the recipient of a Transfer Capability Methodology can provide documented concerns.</p> <p>R5 - It is unclear whether or not R5 includes those recipients under R2.2. R5 should be modified to state that recipients as a result of R2.2 must specifically request the assessment, and then allow 30 days from the time of request for it to be provided. Otherwise, R5 may become impossible to meet. As an example, if an entity requests the Transfer Capability Methodology under R2.2.2 six months after the assessment was completed, it is not possible to provide the assessment 45 days after it was completed.</p>
<p><b>Response:</b> The SDT thanks you for providing your comments. We have modified R 1.4.1, R 1.4.2 and R5 based on your comments. However, we have not changed other requirements.</p> <p>R 1.1 –The SDT believes the term “transfer” correctly describes the driver that is being used to stress the system.</p> <p>R1.2 - The SDT believes the word “respect” correctly describes the treatment of known SOLs and is the term used in the existing FAC-012.</p> <p>R1.3 - The SDT believes the term “Planning practices” is a broader term than “planning criteria” and should be used. We have changed “assessments” to “assessment”.</p> <p>R1.4.3-The STD does not want to specify that transfers be imposed on the system during peak demand. As written the requirement is to document the demand level when the assessment was conducted. If the .planner wants to include transfers at the system peak they need to provide that information in the documentation.</p> <p>R1.4.4-The STD does not want to restrict the modeled Transmission uses to only “approved Firm” uses. The requirement is to document the Transmission uses</p>		

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Organization	Yes or No	Question 5 Comment
		<p>modeled in the assessment. If the planner wants to restrict the uses to approved firm they need to provide that information in the documentation.</p> <p>R1.4.5-The STD does not believe developing a definition of parallel path loop flow adjustment would be productive. Parallel path and loop flow are commonly used terms in the industry, for example MOD 001-1a, R9. The requirement provides the planner with the flexibility to address parallel path (loop) flow in their assessment and requires them to provide documentation about how they are addressed.</p> <p>R1.5- The STD does not want to restrict how the transfers are simulated. If the planner wants to simulate transfers only through generation shifts they need to provide that information in the assessment.</p> <p>R 3-The SDT believes that there does not need to be a time limit imposed on when the requestor provide written documentation regarding their concerns. Conditions may change after a methodology is implemented such that new concerns may be identified by entity.</p> <p>R5 has been edited to read, "Each Planning Coordinator shall make the documented Transfer Capability assessment results available within 45 calendar days of the completion of the assessment to the recipients of its transfer capability methodology pursuant to R2.1 and R2.2. However, if a functional entity that has a reliability related need for the results of the annual assessment of the Transfer Capabilities makes a written request for such an assessment after the completion of the assessment, the Planning Coordinator shall make the documented Transfer Capability assessment results available to that entity within 45 calendar days of receipt of the request."</p>
<p>ISO New England, Inc.</p> <p>New York Independent System Operator</p>		<p>R1.1 - This requirement is unclear as written. Using the term "transfers" suggests that the values are known at the initiation of the study. We suggest "transfers" be replaced with "interfaces" to become "Criteria for the selection of the interfaces to be assessed."</p> <p>R1.2 - The intent of this requirement is unclear. If the point of this effort is to determine transfer limits in a planning space, why would the analysis respect known SOLs. More confusion is added if the system being analyzed contains transmission upgrades which are not reflected in current known SOLs. This should be deleted.</p> <p>R1.4.4 - It is unclear what the meaning of "uses" is in this context.</p> <p>R3 - There should be a time limit with respect to when the recipient of a Transfer Capability Methodology can provide documented concerns. R5 - It is unclear whether or not R5 includes those recipients under R2.2.</p> <p>R5 should be modified to state that recipients as a result of R2.2 must specifically request the assessment and then allow 30 days from the time of request for it to be provided. Otherwise, R5 may become impossible to meet. As an example, if an entity requests the Transfer Capability Methodology under R2.2.2 6 months after the assessment was completed, it is not possible to provide the assessment 45 days after it was completed.</p>



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Organization	Yes or No	Question 5 Comment
<p><b>Response:</b> The SDT thanks you for providing your comments. We have modified R5 based on your comments. However, we have not changed other requirements.</p> <p>R 1.1 –The SDT believes the term “transfer” correctly describes the driver that is being used to stress the system.</p> <p>R1.2 - The SDT believes the word “respect” correctly describes the treatment of known SOLs and is the term used in the existing FAC 012.</p> <p>R1.4.4-The STD believes that the word “uses” is a commonly understood term that includes network and point to point Transmission uses. The requirement is to document the Transmission uses modeled in the assessment. R 3-The SDT believes that there does not need to be a time limit imposed on when the requestor provides written documentation regarding their concerns. Conditions may change after a methodology is implemented such that new concerns may be identified by entity.</p> <p>R5 has been edited to read, “Each Planning Coordinator shall make the documented Transfer Capability assessment results available within 45 calendar days of the completion of the assessment to the recipients of its transfer capability methodology pursuant to R2.1 and R2.2. However, if a functional entity that has a reliability related need for the results of the annual assessment of the Transfer Capabilities makes a written request for such an assessment after the completion of the assessment, the Planning Coordinator shall make the documented Transfer Capability assessment results available to that entity within 45 calendar days of receipt of the request.”</p>		
<p>Florida Municipal Power Agency</p>	<p>Yes</p>	<p>R2 is confusing. The main requirement requires distribution of the methodology; however, bullet 2.2 requires distribution of the results. Which is it? It would seem bullet 2.2 needs to be redrafted to refer to the methodology since the distribution of results is in R5.</p> <p>R5 needs more clarity. It says that the PC must make the results available, but to whom? Due to CEII, we presume this is not for publishing on a web-site, so, we presume that the recipients would be the same as in R2, but, R5 should specifically say so.</p> <p>Would it make sense to move R4 to before R2 and combine R2 with R5 , and R3 with R6 and have R2/R5 and R3/R6 refer to both the methodology and results?</p>
<p><b>Response:</b></p> <p>R2 - Thank you for your comments. R2.2 requires the distribution of the Planning Coordinator’s transfer capability methodology, not the assessment results. The SDT clarified this in the revised standard.</p> <p>R5 has been edited to read, “Each Planning Coordinator shall make the documented Transfer Capability assessment results available within 45 calendar days of the completion of the assessment to the recipients of its transfer capability methodology pursuant to R2.1 and R2.2. However, if a functional entity that has a reliability related need for the results of the annual assessment of the Transfer Capabilities makes a written request for such an assessment after the completion of the assessment, the Planning Coordinator shall make the documented Transfer Capability assessment results available to that entity within 45 calendar days of receipt of the request.”</p>		

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Organization	Yes or No	Question 5 Comment
<p>Move R4 to before R2 and combine R2 with R5 was suggested. The SDT believes the current ordering provides the best clarity. R1, R2 and R3 deal with the methodology and R4, R5 and R6 deal with the assessment.</p>		
SERC Planning Standards Subcommittee	Yes	<p>The comments expressed herein represent a consensus of the views of the above-named members of the SERC EC Planning Standards Subcommittee only and should not be construed as the position of SERC Reliability Corporation, its board, or its officers.</p>
<p><b>Response:</b> Noted.</p>		
MRO's NERC Standards Review Subcommittee		<p>Requirement R1.2 should explicitly state that the assessment shall respect known Planning Horizon SOLs because the standard is applicable for the planning horizon and not the operating horizon. Otherwise, the lack of qualification could lead to interpretation issues with this Requirement.</p>
<p><b>Response:</b> For R1.2, the SOLs could be either the planning horizon or the operating horizon. R1.2 requires a "statement that the assessment shall respect known System Operating Limits (SOLs)." Although the standard applies to the planning horizon, good planning practice may require operating horizon SOLs if the SOLs are known and the SOLs could impact the planning horizon; therefore the SDT does not believe that it should only be planning SOLs.</p>		
IRC Standards Review Committee	Yes	<p>For bullet 1.2, do only the SOLs in the planning horizon governed by FAC-011-2 apply or do those in the operating horizon also apply? Since the standard applies to the planning horizon, it should only be planning SOLs. Furthermore, this bullet is administrative in nature and should be modified. A statement that SOLs shall be respected provides no reliability value. How does an entity prove compliance with R3? How does it prove it did not receive comments from a recipient of the methodology?</p>
ERCOT	No	<p>R3 should be removed from the standard as it is an administrative requirement that is unnecessary, contrary to the results-based standards. What value does it provide other than to make third parties feel like they can force a response to their input? Transfer capability calculations have been performed for so long and are so well understood by industry, it is hard to fathom a third party providing any valuable technical input that a Planning Coordinator has not already considered. This requirement presumes that the Planning Coordinator may not be capable of performing the function for which they are registered and certified. It further presumes that NERC and Regional Entities' Compliance Monitoring and Enforcement Processes will not be able to identify deficiencies with complying with Requirement R1.</p> <p>Furthermore, the requirement to respond to all technical comments and/or revise the methodology would be a significant administrative burden to the Planning Coordinators. Part 2.2 should be either be removed due to its subjective nature or criteria for requesting such data should be added to clarify what entities can request such data, under what circumstances they can do so, and how disputes regarding such requests are to be resolved. More specifically, R3 contains no indication regarding the entity that makes the determination that a</p>

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		<p>functional entity had a reliability-related need to the results of the annual assessment of Transfer Capabilities. In R1, the term Transfer Capability Methodology is used and capitalized. It does not have a current definition in the NERC glossary and the SDT did not propose a definition. It should be defined or made lower case.</p>
<p><b>Response:</b> For R1.2, the SOLs could be either the planning horizon or the operating horizon. R1.2 requires a “statement that the assessment shall respect known System Operating Limits (SOLs).” Although the standard applies to the planning horizon, good planning practice may require operating horizon SOLs if the SOLs are known and the SOLs could impact the planning horizon; therefore the SDT does not believe that it should only be planning SOLs. Whether R1.2 is “is administrative in nature” or not, it ensures that Planning Coordinators must include known SOLs or suffer a penalty for not including them. The SDT believes that including known SOLs does have reliability value.</p> <p>“How does an entity prove compliance with R3?” As stated in M3, “Each Planning Coordinator shall have evidence, such as dated e-mail or dated transmittal letters, that the Planning Coordinator provided a written response to that commenter in accordance with Requirement R3.” “How does it prove it did not receive comments from a recipient of the methodology?” In the standard’s Data Retention section, “The Planning Coordinator shall retain evidence to show compliance with Requirements R3, R4, R5 and R6 for the most recent assessment.” The evidence could include any comments received and could include an attestation if no comments were received.</p> <p>The SDT does not believe that “R3 should be removed from the standard as it is an administrative requirement that is unnecessary, contrary to the results-based standards.” Requiring the Planning Coordinator to respond to commenters is necessary as it may lead to changes in the methodology; at the very least, it makes the methodology more transparent to all NERC registered functional entities. The SDT does not agree that Planning Transfer Capability methods are well understood or transparent to all NERC registered functional entities that may comment. R3 does not presume “that the Planning Coordinator may not be capable of performing the function for which they are registered and certified” nor does it presume “that NERC and Regional Entities’ Compliance Monitoring and Enforcement Processes will not be able to identify deficiencies.” It does presume that NERC registered functional entities may need greater transparency on the methodology. It is unclear if R3 “would be a significant administrative burden to the Planning Coordinators.” If R3 does become a significant administrative burden to some Planning Coordinators, then it would indicate that their methodology is not transparent to other reliability related entities.</p> <p>It is unclear why the commenter believes that R2.2 is subjective. In R2.2, the entity making a request for a Transfer Capability assessment must be a NERC registered functional entity. The requirement is in the context of a NERC Reliability Standard. It is evident that NERC registered functional entities are being addressed. Note that the SDT did modify R2, Part 2.2 to clarify that the intent is to provide the methodology to any functional entity that has a reliability-related need for the methodology.</p> <p>The SDT has modified the draft standard to use the lower-case lettering for the word, “methodology” throughout the standard.</p>		
Arizona Public Service Company		<p>FAC-013-2 appears to duplicate assessment study work required in MOD-001. The MOD-001, MOD-028, MOD-029, and MOD-030 standards essentially require that entities have a methodology and perform an Available Transfer Capability Assessment, with potential of also having to perform a Total Transfer Capability assessment, with no defined date-range which, for some utilities, will be up to 10 years. FAC-013-2 requires entities perform a Transfer Capability assessment for years 1-5, thereby making FAC-013-2 a duplicative</p>

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		process.
<p><b>Response:</b> The SDT recognizes that FAC-013-2 may use the same study work that is used in MOD-029-1; that would not be true for entities that use MOD-028-1 and MOD-030-2. Regardless, the methodologies in the MOD standards DO have a defined date range (the Operations Planning horizon). FAC-013-2 has a different date range (the Near-Term Planning Horizon). Therefore the standards are not duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the study work is the same study work that is used in MOD-029-1. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The MOD Standards do not afford such flexibility.</p>		
Western Electricity Coordinating Council		<p>We agree that the requirements of proposed FAC-013-2 pose no threat to reliability and, in fact, are beneficial to reliability. However, we also believe that the requirements of proposed FAC-013-2 are duplicative of the efforts required by FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004.</p> <p>For clarity and ease of implementation, the requirements of proposed FAC-013-2 should be incorporated as new requirements or added into the appropriate requirements of existing standards FAC-010, FAC-014, and the TPL Planning Standards. The efforts to implement FERC's directives into the TPL-001 through TPL-004 planning standards have resulted in clarification of multiple sensitivities that must be considered when conducting the Transmission Assessments required by the new TPL-001-1 planning standard. The information gleaned by conducting and assessing these sensitivity studies would provide the Planning Coordinator with the same information regarding the impact of system changes on their Transfer Capability as obtained by meeting the requirements in the proposed FAC-013-2.</p> <p>Because some entities my vote in the negative for FAC-013-2 out of concerns related to double jeopardy for any potential violations of the proposed FAC-013-2 and currently existing standards, incorporating the requirements of FAC-013-2 into the appropriate existing standards may be more acceptable to the industry.</p>
<p><b>Response:</b> The SDT recognizes that FAC-013-2 may use some of WECC's required efforts in FAC-010, FAC-014, and the TPL Planning Standards TPL-001 through TPL-004; that would not necessarily be true for entities outside of WECC. Regardless, the methodology in FAC-013-2 has a different date range (the Near-Term Planning Horizon). Therefore the standards are not completely duplicative for WECC and definitively not duplicative for non-WECC entities; even if some of the effort is the same work that is used in other standards. FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The MOD and TPL Standards do not afford such flexibility.</p>		
Ameren	Yes	<p>R1.4.3 should be modified to be System demand, including but not limited to forecast peak demand and appropriate load distribution.</p> <p>R1.4.6 should be limited to single contingency events for the transfer capability values to have meaning. System performance deficiencies for multiple contingency events can be mitigated by dropping of system load under the existing TPL standards.</p>

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		R1.4.8 should be added to cover distribution factor cutoff assumptions. In addition, the new MOD-004 standard has a requirement R6 to establish a CBM value for each ATC Path to be used in planning years 2 through 10. This applies to the Transmission Planner, but should be identified in the assumptions.
<p><b>Response:</b> FAC-013-2 has been written to provide flexibility to the Planning Coordinator to perform the assessment according to their knowledge of the behavior and needs of their system. The SDT does not believe it is appropriate to specify load level, contingency events, nor cut off factors to be used in the assessment.</p>		
Duke Energy	Yes	<p>Duke Energy appreciates the work of the drafting team and offers the following clarifying changes for further improvement to the standard:</p> <ul style="list-style-type: none"> <li>o As written, R2.2 is hard to follow. Suggest rewriting as follows: “Distribute the results of the annual assessment of Transfer Capabilities to any other functional entity that has a reliability-related need, within 30 days of receiving a written request.”</li> <li>o As written, R4 could possibly allow the Planning Coordinator to conduct an assessment based on a simulation that has not been updated. We believe the intent was to require a simulation to be performed each calendar year and assessment conducted based on that simulation. To clarify this intent, suggest rewriting as follows: “During each calendar year, each Planning Coordinator shall conduct simulations and document an assessment based on those simulations in accordance with its Transfer Capability Methodology for at least one year in the Near-Term Transmission Planning Horizon.”</li> </ul>
<p><b>Response:</b> R2.2 The SDT agrees with the proposed language in R2.2 and has incorporated the intent of this suggestion in the revised standard. The revised standard requires distribution of the methodology under R2, Part 2.2 and distribution of the assessment results under R5 – in both cases to those entities with a reliability related need for the information.</p> <p>R4. The SDT agrees with the proposed language in R4 and will incorporate it into the standard.</p>		
Tri-State Generation & Transmission Assn., Inc.	Yes	Add the following to the end of the sentence in R5: “...and any other functional entity in whose system the assessment finds a future weakness or limiting Facility.” M5 does not need to change but the VSL for R5 would also need to have similar language inserted.
<p><b>Response:</b> The SDT agrees that sharing of information between reliability related entities is important and has incorporated requirements to share assessment information with neighboring entities. The SDT does not believe it would be appropriate to have an auditable and sanctionable requirement to share beyond that scope. Because of equalization in models, less familiarity with the practices and procedures of non-adjacent entities, and the expectation that Planning Coordinators will use good engineering judgment in what information needs to be communicated with others; the SDT does not believe it necessary to add the suggested requirement.</p>		
Xcel Energy	Yes	Xcel Energy is unable to appreciate the BES reliability need for this standard since we believe that a majority,

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		<p>if not all, of its requirements are addressed in existing reliability standards. According to the December 9, 2010 White Paper prepared by the SDT for the draft FAC-013-2, there is a desire to “add to the portfolio of knowledge for planning for future reliable operation of the BES” and “to identify potential future weaknesses in the system.” However, Xcel Energy believes that the proposed FAC-013-2 draft: (</p> <p>1) has Transfer Capability methodology requirements that are effectively the same as, if not duplicative of, those for Planning Horizon SOL Methodology in FAC-010-2,</p> <p>(2) any Transfer Capability Methodology developed per this standard will essentially be no different than one of the three methodologies in MOD-028, MOD-029 or MOD-030, albeit applied to the planning horizon, and</p> <p>(3) the annual transfer capability assessment requirement significantly overlaps with the scope of existing regional planning assessment studies performed per TPL-005 and TPL-006. Therefore, we conclude that the draft FAC-013-2 is not needed to address any reliability gap. We suggest a Transfer Capability assessment belongs in the new TPL-001-2 standard under development, where it could be studied in one of the Near-Term Transmission Planning Horizon studies, and where past Transfer Capability studies (as qualified in R2.6 of TPL-001-2 Draft 6) would be acceptable under the test for no material changes in the BES (don’t force an annual assessment of Transfer Capability).</p>
<p><b>Response:</b> The comments indicate that the standard is believed to be either duplicative or unnecessary for reliable planning. FERC Order 729 addressed the need for the standard and determined in paragraph 290 that the assessment of transfer capability “will be useful for long-term planning, in general, by measuring sufficient long-term capacity needed to ensure the reliable operation of the Bulk-Power System.” The standard drafting team is charged with addressing FERC’s directives to the ERO and has sought to find an equally effective and efficient means to meet FERC’s directive - while maximizing the benefit to reliable transmission system planning.</p>		
<p>The SDT does not disagree that it may be appropriate to move the requirements of FAC-013-2 into the TPL standards at some time in the future.</p>		
American Transmission Company	Yes	Requirement R1.2 should explicitly state that the assessment shall respect known Planning Horizon SOLs because the standard is applicable for the planning horizon and not the operating horizon. Otherwise, the lack of qualification could lead to interpretation issues with this Requirement.
<p><b>Response:</b> For R1.2, the SOLs could be either the planning horizon or the operating horizon. R1.2 requires a “statement that the assessment shall respect known System Operating Limits (SOLs).” Although the standard applies to the planning horizon, good planning practice may require operating horizon SOLs if the SOLs are known and the SOLs could impact the planning horizon; therefore the SDT does not believe that it should only be planning SOLs.</p>		
Tucson Electric Power	Yes	This should be a regional planning activity which includes the Reliability Coordinator, not solely addressed by Planning Coordinators. Need a clear description highlighting the distinctions between Long-Term and Near-Term. How will they be treated differently? E.g. Do what we do today Long-Term and perform more operating type of studies based on MOD-030?

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<p><b>Response:</b> The SDT agrees that some regions may need to do FAC-013-2 as a regional planning activity that includes the Reliability Coordinator. However, the standard does not prevent FAC-013-2 as a regional planning activity, and the SDT does not believe that FAC-013-2 should be required as a regional planning activity.</p> <p>TPL-001-2 introduces the Long-Term Transmission Planning Horizon definition and provides a clear distinction from the Near-Term Transmission Planning Horizon.</p>		
Independent Electricity System Operator	Yes	<p>We thank the SDT for responding positively to industry comments to remove the two terms PTC and PTCMD, and insert the appropriate wording into the requirements to take care of calculation of Transfer Capability in the Near-Term Transmission Planning Horizon. However, the term “Transfer Capability Methodology” is capitalized, implying that this is a defined term but this term is neither defined in the NERC Glossary nor being proposed in the standard as a new term. We note that this “term” is currently used in both FAC-012-1 and FAC-013-1 though not included in the NERC glossary. We do not have a concern with using this term to indicate that it is a documented methodology for use in performing an annual assessment of Transfer Capability in the Near-Term Transmission Planning Horizon, but it needs to be changed to lower case; or else this term needs to be defined. Using lower-case lettering would be consistent with the approach used in the recently approved standard PRC-006-1, where the description “UFLS entities” was established and used within the standard to avoid long-winded requirements that repeatedly refer to the same entities.</p>
<p><b>Response:</b> Thank you for your comment. The SDT has modified the draft standard to use the lower-case lettering for the term “methodology” throughout the standard.</p>		
Tennessee Valley Authority		<p>TVA appreciates the work of the SDT in developing this revised standard. While we are casting an approval vote, we are doing so with the comment on the new R6 (see response to Q3 above) and the following editorial comments:</p> <p>”transmission” is misspelled (tranmission) in the definition for Near-Term Transmission Planning Horizon.</p> <p>As written, R2.2 is hard to follow. Suggest rewriting as follows: “Distribute the results of the annual assessment of Transfer Capabilities to any other functional entity that has a reliability-related need, within 30 calendar days of receiving a written request.”</p> <p>In section D, 1.3 Data Retention - in the first bullet, suggest changing “The Planning Coordinator shall have its in force Transfer Capability Methodology...” to “The Planning Coordinator shall have its current Transfer Capability Methodology...”</p>
<p><b>Response:</b> The typo has been fixed. (“transmission” is misspelled (tranmission))</p> <p>R2.2 The SDT agrees with the proposed language change and has incorporated this into the revised standard – the revised standard requires the methodology to</p>		

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<p>be provided to entities with a reliability-related need, and R5 has been clarified to indicate that the assessment results must be provided to entities with a reliability-related need for the information, subject to confidentiality rules.</p> <p>D, 1.3 The SDT will adopt the proposed wording change to D, 1.3.</p>		
Orlando Utilities Commission	Yes	Excellent work.
Manitoba Hydro	No	