

SAR Comment Form
Proposed Revisions to Existing Standard Number MOD-001-0
and
Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0,
and MOD-009-0

This form is to be used to submit comments on Draft 1 of two individual SARs: 1) Proposed Revisions to Existing Standard Number MOD-001-0 dealing with AFC/ATC/TTC; and 2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 dealing with CBM/TRM. Comments must be submitted by **August 08, 2005**. You may submit the completed form by emailing it to: sarcomm@nerc.com with the words "ATC/TTC/CBM/TRM Comments" in the subject line. If you have questions please contact Mark Ladrow at mark.ladrow@nerc.net or by telephone at 609-452-8060.

ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:

- DO:**
- Do enter text only, with no formatting or styles added.
 - Do use punctuation and capitalization as needed (except quotations).
 - Do use more than one form if responses do not fit in the spaces provided.
 - Do submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not insert tabs or paragraph returns in any data field.
 - Do not use numbering or bullets in any data field.
 - Do not use quotation marks in any data field.
 - Do not submit a response in an unprotected copy of this form.

Individual Commenter Information	
(Complete this page for comments from one organization or individual.)	
Name:	
Organization:	
Telephone:	
Email:	
NERC Region	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/> 1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/> 2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/> 3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/> 4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/> 5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/> 6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/> 7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/> 8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/> 9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	
<input type="checkbox"/> NA - Not Applicable	

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Background Information:

The Long-Term AFC/ATC Task Force (LTATF) was formed to develop specific recommendations for the calculation and coordination of AFC/ATC with the goal of increasing market liquidity and enhancing grid reliability. The task force’s work was coordinated with NAESB to separate business practices from reliability concerns. The LTATF evaluated the results of the short-term recommendations in the Alliant West area for summer 2004, and used this evaluation when considering whether to recommend the Alliant West short-term recommendations continue.

In developing their recommendations the LTATF considered the calculation for AFC/ATC, communication and coordination of AFC/ATC, and consistency between transmission planning and AFC/ATC calculations. A final LTATF report was presented to the Standing Committees in March 2005. The task force used the report and recommendations to develop proposed standards for ATC/TTC and CBM/TRM. The proposed “Modification to MOD-001-0 Documentation of ATC and TTC Calculation” SAR and “Modification to standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 SAR are the culmination¹ of the LTATF’s work and is the subject matter for this Comment Form.

The SAC and the LTATF would like to receive industry comments on the scope and need for these two individual SARs. Accordingly, we request your comments included on this form, emailed to sarcomm@nerc.com with the subject “ATC/TTC/CBM/TRM Comments” by **August 7, 2005**.

Tabular Summary of Requirement Changes

SAR	Existing Standard	Requirement	Change
1)	MOD-001-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.6	Add/Delete Language
		R1.7	Add/Delete Language
		R1.7.1	Add Requirement
		R.1.7.2	Add Requirement
		R1.7.3	Add Requirement
		R1.7.4	Add Requirement
		R1.7.5	Add Requirement
		R1.7.6	Add Requirement

¹ The LTATF also developed a proposed business practice that was submitted to NAESB.

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		R1.7.7	Add Requirement
		R1.7.8	Add Requirement
		R1.7.9	Add Requirement
		R1.7.10	Add Requirement
		R1.8	Add/Delete Language
		R1.9	Add/Delete Language
		R1.10	Add Requirement
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
		R3	Add Requirement
2)	MOD-004-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.4	Add/Delete Language
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.5.2	Add Requirement
		R1.6	Add/Delete Language
		R1.6.1	Add Requirement
		R1.7.1	Add Requirement
		R1.10	Add/Delete Language
		R1.11	Add Requirement
		R1.12	Add Requirement
		R2	Add/Delete Language
	MOD-005-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language

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		R3	Add/Delete Language
	MOD-006-0	Entire	Withdraw
	MOD-008-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.9	Add Requirement
		R1.3.10	Add Requirement
		R1.5	Add/Delete Language
		R1.5.1	Add Requirement
		R1.6	Add Requirement
		R1.7	Add Requirement
		R1.8	Add Requirement
		R1.8.1	Add Requirement
		R1.8.2	Add Requirement
	MOD-009-0	R1	Add/Delete Language
		R1.1	Add/Delete Language
		R1.2	Add/Delete Language
		R1.3	Add/Delete Language
		R1.3.1	Add Requirement
		R1.4	Add/Delete Language
		R2	Add/Delete Language
		R3	Add/Delete Language
		R4	Add Requirement

1) Proposed Revisions to Existing Standard Number MOD-001-0 (AFC/ATC/TTC)

2) Proposed Revisions to Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0 (CBM/TRM)

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AFC/ATC/TTC SAR Regarding Existing Standard MOD-001-0

1. Is there a reliability need for the proposed standard?

Yes

No

Comments:

2. Is the proposed scope of the standard sufficient to address reliability concerns; i.e. should the proposed standard include standardizing methods for the calculation of ATC, AFC and TTC?

Yes

No

Comments: We agree that the proposed scope of the standard is sufficient to address reliability concerns. We disagree that there needs to be a standard method for calculation of ATC, AFC and TTC for all ISOs/RTOs. Some differences in methodologies (market, non-market, etc.) may exist, but the processes must be coordinated and work together.

3. Do you agree with the scope of the proposed standard?

Yes

No

Comments: See comments above.

4. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?

Note: NAESB has a proposal for companion business practice - R05004)

Yes

No

Comments:

5. Do you agree with the list of entities to which the standard would apply?

Yes

No

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Comments: Aspects of this standard would also apply to Transmission Planner, Transmission Owner, Planning Authority, RC and Regional Reliability Organization.

6. Do you have any other terms that should be included in the definitions?

Yes

No

Comments:

7. Do you have any other data elements that should be included in the coordination and communication of the calculation of AFC/ATC/TTC?

Yes

No

Comments:

8. Do you have any other comments on these proposed standards?

Comments:

We would suggest the following replace all of R1, not just the first paragraph:

“The development of TTC/ATC/AFC methodology is primarily the responsibility of the Transmission Provider, but may be delegated to a Balancing Authority, a Reliability Coordinator. All responsible entities shall develop and document a TTC and ATC/AFC methodology. In the case where the methodology is developed by a designated entity, that methodology document must clearly indicate to which Transmission Providers it applies. That methodology shall be reviewed by the RRO to ensure coordination between the entities within that region and to ensure compliance with this standard. This methodology document shall be available to NERC, the Regions, and the stakeholders in the electricity market.”

With this change, the language in R1.12 is no longer needed.

R1.7 - Several items in the set may be considered confidential information that should not be shared with market participants (such as generator outages and generator dispatch orders). These items can be shared with Transmission Service Providers to be used in TTC and ATC calculations but not be released to market participants.

R1.7.2 - Because of variations on how generation is dispatched in different markets, the drafting team will need to be clear on the generator dispatch information being requested and how it will be used.

R1.7.2 - For generators that will be used to determine firm AFC, these should be limited to generators that have already secured firm usage of the transmission system. A transmission service provider should not include generators in the firm AFC calculation that do not have firm transmission service backing them up.

R1.7.6 - Should a NERC standard reference a tool (such as the SDX) or be more general and apply to the current tool?

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R1.7.7 - We don't understand why AFC will be exchanged only between entities that have coordination agreements. In the Monitoring/Coordination Section of the LTATF Final Report, it states "The Task Force recommends the revision of the existing NERC standards to require the recognition and respect of impacts on external flowgates/paths in AFC/ATC calculations, and the establishment of NERC standards on AFC/ATC coordination." Monitoring other party flowgates was recommendation V. in the AWTTF Short-Term Recommendations.

R1.9 - The assumption should also include treatment of transmission requests with a status of Study (for both the transmission provider requests and neighboring transmission provider requests) and long-term firm reservations with roll-over rights (for both the transmission provider requests and neighboring transmission provider requests).

General - The concepts in Apendix will need to be considered in development of the standard. It contains ATC and AFC formula that are not stated in the body of the SAR.

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CBM/TRM SAR Regarding Existing Standards MOD-004-0, MOD-005-0, MOD-006-0, MOD-008-0, and MOD-009-0

9. Is there a reliability need for the proposed standard?

Yes

No

Comments:

10. Is the calculation and/or withholding of CBM (as opposed to TRM) as an explicit quantity necessary for reliability and should it be part of a reliability standard? Y/N Comment?

Yes

No

Comments: Some areas use zero for CBM. If CBM is used, the standardized definitions should be used and amount disclosed.

11. Do you agree with the scope of the proposed standard?

Yes

No

Comments:

12. Are there aspects of the proposed standard you believe should be developed as a business practice through NAESB?

Note: NAESB has a proposal for companion business practice - R05004)

Yes

No

Comments:

13. Do you agree with the list of entities to which the standard would apply?

Yes

No

Comments: Aspects of this standard should also apply to Transmission Planner, Transmission Owner, Planning Authority, RC and Regional Reliability Organization

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14. Do you have any other terms that should be included in the definitions?

Yes

No

Comments:

15. Do you have any other data elements that should be included in the coordination and communication of the calculation of CBM/TRM?

Yes

No

Comments:

16. Do you have any other comments on these proposed standards?

Comments:

COMMENTS TO MOD-004-0 and MOD-008-0

R1 - References to having a single regional CBM methodology and TRM methodology should be removed along with references to exceptions for entities that are members of an RTO or an ISO.

R.1.6 - To the extent generators that are not committed to serve load inside the transmission provider's system are considered in the CBM requirement determination, there should be CBM preserved on impacted flowgates for the use of this generation.

There are two R1.4, R1.5 and R1.6.

R1.8 - CBM should not be used in place of maintaining either minimum planning reserves or to compensate for poor generator maintenance practices.

General - When establishing CBM import area boundaries, there is an explicit assumption that all generators can serve all load within the boundary (with no constraints). As part of the description of the CBM calculation process, it should describe the basis for establishing the CBM import area boundaries.

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