

NERC drafting team agrees with NAESB and will recommend that this standard be retired when replaced with requirements in a NAESB business practice

A. Introduction

1. **Title:** Procedure to resolve comments and questions regarding ATC and AFC Methodologies and Values

2. **Number:** MOD-003-1

3. **Purpose:** To promote the communication of Transmission Service Provider calculation methodologies and values used for calculating Available Transfer Capability (ATC) and Available Flowgate Capability (AFC) among Transmission Customers.

NAESB Comment: This should be business practice; it only addresses and penalizes failures to communicate. Communication is typically a NAESB business practice development area. Failure to communicate to does not affect reliability of the system.

Deleted: Regional ...Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values ... [2]

Deleted: 0

Deleted: the consistent and uniform application ...Transfer Capability among Transmission Service Providers, the Regional Reliability Organizations need to review adherence to Regional methodologies ...Total Transfer Capability (TTC) and ... [3]

NAESB thinks that th
a NAESB business pr

Deleted:

Formatted: Font: Bold

Deleted: Comment: NAESB comment that this should be business practice; it only addresses and penalizes failures to communicate. Communication is typically a NAESB business practice development area. Failure to communicate to does not affect reliability of the system.

Formatted: Indent: Left: 0.35"

4. Applicability:

4.1. Each Transmission Service Provider

4.1.1 Entity Limitations. Transmission Service Providers that are not required to have an OASIS may publish on a publicly available Web site the information discussed in the requirements and measurements sections of this standard.

NAESB Comment: Are there any non-jurisdictional entities that 4.1.1 would actually apply to?

Deleted: Comment: talking about values that go into the calculation or the actual calculated ATC/AFC value ... [4]

Formatted ... [5]

Formatted ... [6]

Formatted: Font: Not Bold

Deleted: Regional Reliability Organization

Formatted: Indent: Left: 0.7", Hanging: 0.8"

Formatted: Indent: Left: 1.15", No bullets or numbering

Formatted: Space After: 0 pt

Deleted: Comment: are there non-jurisdictional entities that 4.1.1 wo ... [7]

Formatted: Bullets and Numbering

Deleted: <#>Each Regional Reliability Organization, in conjunction with ... [8]

Formatted ... [9]

Deleted: Regional Reliability Organization ... a web site that is ... [10]

Formatted ... [11]

Deleted: April 1, 2005

B. Requirements

R1. The Transmission Service Provider shall post on OASIS the telephone number and email address of a contact person to whom concerns are to be addressed regarding the AFC and the ATC methodologies and their associated numeric values. [Risk factor: t.b.d.]

NAESB Comment:
Concerned about having
two methods of
contacting TSPs

NAESB Comment: Being expected to post new names with shift changes will be administrative burden for TP.

NAESB Comment: The person who knows the methodology is not necessarily the same individual who contributes to the day to day ATC/AFC posting; posting of one e-mail address will not necessarily be sufficient for answering all questions.

Standard MOD-003-1 — Procedure to resolve comments and questions regarding ATC and AFC Methodologies and Values

R2. Each Transmission Service Provider shall create on its OASIS an electronic data input ~~web form~~ for the specific purpose of receiving and responding to queries regarding the AFC and the ATC methodologies and their associated numeric values. [Risk factor: t.b.d.]

~~NAESB comment: Need clarification whether standard would allow submission of question through e-mail as provided in R1 or only through OASIS posting as set forth in R2?~~

~~NAESB Comment: If questions are accepted through e-mail are those also required to be posted on OASIS?~~

R3. Subject to commercial confidentiality constraints, within one week of the electronic receipt of a query received via the aforementioned ~~web form~~ in R2, the Transmission Service Provider shall post on OASIS an answer to the received query. [Risk factor: t.b.d.]

~~NERC comment: NAESB will be asked to create a template(s) for OASIS postings~~

~~NAESB Comment: If NAESB develops template for posting and is not referenced in the NERC standard, does that mean this requirement lends itself to being adopted by NAESB?~~

~~NAESB Comment: R3 treats all queries equally. All queries must be responded to within a week. Some may take longer to respond to due to the nature of the query. Limitation of 1 week appears to be arbitrary. It is the understanding of the NAESB subcommittee that R3 only addresses queries submitted under R2.~~

C. Measures

M1. The Transmission Service Provider shall have documentation that information required by MOD-003-1 R1 was posted on OASIS.

M2. The Transmission Service Provider shall provide ~~upon request~~ the internet location of the OASIS website containing the information required by MOD-003-1 R2.

M3. The Transmission Service Provider shall ~~have~~ documentation, such as a log, containing the information required by MOD-003-1 R3 demonstrating the timeframe within which the answer was provided.

D. Compliance

1. Compliance Monitoring Process

1.1. Compliance Monitoring Responsibility

Deleted: 0

Deleted: Procedure for Input on

Deleted: TTC and

Formatted: Font: 12 pt

Deleted: <#>Comment: The person who knows the methodology is n... [12]

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Bullets and Numbering

Formatted: ... [13]

Formatted: Font: 12 pt

Formatted: Highlight

Formatted: Font: 12 pt

Formatted: Highlight

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Deleted: Comment: Need clar... [14]

Formatted: Indent: Left: 0.35"

Deleted: ¶ ... [15]

Formatted: Font: 12 pt

Formatted: Bullets and Numbering

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Deleted: Comment: If NAESB... [16]

Formatted: ... [17]

Deleted: Comment: R3 treats... [18]

Deleted: Regional Reliability... [19]

Deleted: evidence

Deleted: that its procedure for... [20]

Formatted: Bullets and Numbering

Formatted: Highlight

Deleted: provide

Deleted: .

Deleted: The Regional Reliabi... [21]

Formatted: Font: 12 pt

Deleted: April 1, 2005

Compliance Monitor: NERC.

1.2. **Compliance Monitoring Period and Reset Timeframe**

Rolling 3 years

1.3. **Data Retention**

Rolling 3 years.

1.4. **Additional Compliance Information**

None.

2. **Mitigation Time Horizon**

2.1. Long-term planning – t.b.d.

2.2. Operations Planning - t.b.d.

2.3. Same-day Operation – t.b.d.

2.4. Real-time Operations – t.b.d.

2.5. Operations Assessment – t.b.d.

3. **Violation Severity Level**

3.1. Lower:

1.3.1. R3: 1 to 5% of the inquiries received were not answered within 1 week during the prior twelve (12) months

3.2. Moderate:

2.3.1. R3: more than 5% and up to and including 15% of the inquiries received were not answered within 1 week during the prior twelve (12) months

3.3. High:

3.3.1. R3: more than 15% and up to and including 30% of the inquiries received were not answered within 1 week during the prior twelve (12) months

3.3.2. R1: Contact information is incorrect

3.4. Severe:

4.3.1. R1: Contact information is not posted

4.3.2. R2: Inquiry form is not posted

4.3.3. R3: more than 5% of the inquiries were never responded to.

4.3.4. R3: more than 30% of the inquiries received were not answered within 1 week during the prior twelve (12) months

NAESB Comment: There is no real definition what constitutes a valid query. There is potential for queue flooding with spurious queries.

NAESB Comment: Suggestion that a threshold needs to be established for those entities that have low numbers of inquiries.

Deleted: 0

Deleted: Procedure for Input on

Deleted: TTC and

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Deleted: Procedure available on a web site accessible by the Regional Reliability Organizations, NERC, and transmission users.

Formatted: Font: 12 pt

Formatted: Font: 12 pt

Deleted: None specified.

Formatted: Font: 12 pt

Formatted: Bullets and Numbering

Formatted: Space Before: 0 pt

Deleted: Levels of Non-Compliance

Formatted: Bullets and Numbering

Deleted: Level 1

Deleted: Not applicable.

Deleted: Level 2

Deleted: <#>The Regional Reliability Organization does not have a procedure available on an accessible web site, or the procedure does not incorporate all required elements of Reliability Standard MOD-003-0_R1.¶

Deleted: Level 3

Deleted: Not applicable.

Deleted: Level 4

Formatted: Font: Not Bold

Formatted: Outline numbered + Level: 4 + Numbering Style: 1, 2, 3, ... + Start at: 1 + Alignment: Left + Aligned at: 1.15" + Tab after: 1.7" + Indent at: 1.7"

Deleted: April 1, 2005

Deleted: 0

Deleted: Procedure for Input on

Deleted: TTC and

NERC Comment: Queries are for valid questions when denied: why ATC was what it was; rewrite language so that it says what the intent is: for queries to justify denial

E. Regional Differences

1. None identified.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
<u>1</u>	<u>Dec 13, 2006</u>	<u>T.B.D</u>	<u>Revised</u>
<u>1</u>	<u>Jan 22, 2007</u>	<u>T.B.D., applicability</u>	<u>Revised</u>
<u>1</u>	<u>Jan 30, 2007</u>	<u>Review with NAESB</u>	<u>Revised with comments</u>

Deleted: <#> The Regional Reliability Organization has no procedure available. Comment: Suggestion that a threshold needs to be established for those entities that have low numbers of inquiries.¶
Comment: There is no real definition what constitutes a valid query. There is potential for queue flooding with spurious queries.¶
Lohrman's Comment: Queries are for valid questions when denied: why ATC was what it was; rewrite language so that it says what the intent is: for queries to justify denial¶
¶

Deleted: April 1, 2005

Page 1: [1] Deleted 0	Administrator	12/12/2006 3:40:00 PM
Page 1: [1] Deleted Procedure for Input on	Administrator	12/12/2006 5:19:00 PM
Page 1: [1] Deleted TTC and	Administrator	1/22/2007 4:00:00 PM
Page 1: [2] Deleted Regional	Administrator	12/12/2006 3:17:00 PM
Page 1: [2] Deleted Procedure for Input on Total Transfer Capability and Available Transfer Capability Methodologies and Values	Administrator	12/12/2006 5:29:00 PM
Page 1: [3] Deleted the consistent and uniform application	Administrator	12/12/2006 5:17:00 PM
Page 1: [3] Deleted Transfer Capability	Administrator	12/12/2006 5:28:00 PM
Page 1: [3] Deleted among Transmission Service Providers, the Regional Reliability Organizations need to review adherence to Regional methodologies	Administrator	12/12/2006 5:27:00 PM
Page 1: [3] Deleted Total Transfer Capability (TTC) and	Administrator	1/22/2007 4:02:00 PM
Page 1: [4] Deleted Comment: talking about values that go into the calculation or the actual calculated ATC/AFC value itself? Need clarification on this item.	Administrator	2/2/2007 7:12:00 AM
Page 1: [5] Formatted Font: Not Bold	Laura Kennedy	1/30/2007 11:25:00 AM
Page 1: [5] Formatted Font: Not Bold	Laura Kennedy	1/30/2007 11:25:00 AM
Page 1: [6] Formatted Space Before: 0 pt	Administrator	2/2/2007 7:12:00 AM
Page 1: [6] Formatted Space After: 0 pt	Administrator	2/2/2007 7:12:00 AM
Page 1: [7] Deleted Comment: are there non-jurisdictional entities that 4.1.1 would apply to?	Administrator	2/2/2007 7:13:00 AM
Page 1: [7] Deleted	Administrator	1/22/2007 4:03:00 PM

April 1, 2005

Page 1: [8] Deleted	Administrator	12/13/2006 9:20:00 AM
---------------------	---------------	-----------------------

Each Regional Reliability Organization, in conjunction with its members, shall develop and document a procedure on how transmission users can input their concerns or questions regarding the TTC and ATC methodology and values of the Transmission Service Provider(s), and how these concerns or questions will be addressed. The Regional Reliability Organization's procedure shall specify the following:

The name, telephone number and email address of a contact person to whom concerns are to be addressed.

The amount of time it will take for a response

.

The manner in which the response will be communicated (e.g., email, letter, telephone, etc).

What recourse a customer has if the response is deemed unsatisfactory.

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [9] Formatted	Administrator	1/22/2007 4:07:00 PM
-----------------------	---------------	----------------------

Font: 12 pt

Page 1: [10] Deleted	Administrator	12/13/2006 9:21:00 AM
----------------------	---------------	-----------------------

Regional Reliability Organization

Page 1: [10] Deleted	Administrator	12/13/2006 9:23:00 AM
----------------------	---------------	-----------------------

a web site that is accessible by the Regional Reliability Organizations, NERC, and transmission users,

Page 1: [10] Deleted	Administrator	12/13/2006 9:39:00 AM
----------------------	---------------	-----------------------

its procedure for receiving and addressing concerns about

Page 1: [10] Deleted	Administrator	12/13/2006 9:41:00 AM
----------------------	---------------	-----------------------

the TTC and ATC methodology and TTC and ATC values of member Transmission Service Providers

Page 1: [11] Formatted	Administrator	1/22/2007 4:07:00 PM
------------------------	---------------	----------------------

Font: 12 pt

Page 1: [11] Formatted	Administrator	1/22/2007 4:07:00 PM
------------------------	---------------	----------------------

Font: 12 pt

Page 2: [12] Deleted	Administrator	2/2/2007 7:16:00 AM
----------------------	---------------	---------------------

Comment: The person who knows the methodology is not necessarily the same individual who contributes to the day to day ATC/AFC posting; posting of one e-mail address will not necessarily be sufficient for answering all questions.

Comment: if expected to post new names with shift changes will be administrative burden for TP.

Page 2: [13] Formatted	Administrator	1/30/2007 11:57:00 AM
------------------------	---------------	-----------------------

Font: 12 pt, Strikethrough, Highlight

Page 2: [14] Deleted	Administrator	2/2/2007 7:22:00 AM
----------------------	---------------	---------------------

Comment: Need clarification whether standard would allow submission of question through e-mail as provided in R1 or only through OASIS posting as set forth in R2?

Page 2: [15] Deleted	Administrator	2/2/2007 7:23:00 AM
----------------------	---------------	---------------------

Comment: If questions are accepted through e-mail are those also required to be posted on OASIS?

Page 2: [16] Deleted	Administrator	2/2/2007 7:32:00 AM
----------------------	---------------	---------------------

Comment: If NAESB develops template for posting and is not referenced in the NERC standard, does that mean this requirement lends itself to being adopted by NAESB?

Page 2: [17] Formatted	Laura Kennedy	1/30/2007 11:38:00 AM
------------------------	---------------	-----------------------

Indent: Left: 0.35", Space Before: 0 pt

Page 2: [18] Deleted	Administrator	2/2/2007 7:32:00 AM
----------------------	---------------	---------------------

Comment: R3 treats all queries equally. All queries must be responded to within a week. Some may take longer to respond to due to the nature of the query. Limitation of 1 week appears to be arbitrary. It is the understanding of the NAESB subcommittee that R3 only addresses queries submitted under R2.

Page 2: [19] Deleted	Administrator	12/12/2006 3:40:00 PM
----------------------	---------------	-----------------------

Regional Reliability Organization

Page 2: [20] Deleted	Administrator	12/13/2006 9:47:00 AM
----------------------	---------------	-----------------------

that its procedure for receiving input for ATC and TTC methodologies and values meets Reliability Standard MOD-003-0_R1.

Page 2: [21] Deleted	Administrator	12/13/2006 9:49:00 AM
----------------------	---------------	-----------------------

The Regional Reliability Organization shall have evidence that its procedure for receiving input for ATC and TTC methodologies and values is available on a web site accessible by the Regional Reliability Organizations, NERC, and transmission users.